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ALTERNATIVES TO REPLACEMENT OF THE EMBARCADERO FREEWAY AND THE TERMINAL SEPARATOR STRUCTURE

FINAL ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT (EIS/EIR)

AND

SECTION 4(f) EVALUATION

VOLUME II:

SUMMARY OF COMMENTS AND RESPONSES

AUGUST 1996

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INTRODUCTION

This volume contains public comments received on the Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) prepared for Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure, and responses to those comments. Also included is a list of staff-initiated text changes.

Organization of Comments and Responses

All substantive comments made at the Draft EIS/EIR hearings held before the City Planning Commission or its designee on September 27, 1995 and September 28, 1995, and all written comments received during the Draft EIS/EIR public review period from August 25, 1995 to October 23, 1995, are presented herein. Oral comments received at the public hearings are presented by direct quotation, edited to delete repetition and nonsubstantive material only; they are grouped by general subject matter. Written comments are reproduced in the form submitted, and are in two groups: comments from public agencies, and comments from private organizations and individuals.

Each comment is keyed to a written response or group of responses in two ways: with a series of numbers which refer to a section of the text; and with the page number or numbers where the response or responses begin. A key to this system is provided below.

[SECTION NUMBER]	**[COMMENT]**	**[LOCATION OF RESPONSE]**
11.8	I support the recommendation of the Staff Technical Committee that is referred to in the Draft EIR on page 293 as the "DPT Variant".	**p. XXX**

The reader should note that, unless otherwise specified, the term EIS/EIR cited within the body of a response refers to the Final EIS/EIR and the page numbers cited refer to pages within the Final EIS/EIR, whereas page numbers shown in the margin notes refer to the page location in this Comments and Responses document.

Responses to comments are grouped into eight general categories. Within these categories, responses are further grouped by subject matter. Their organization does not precisely mirror the Table of

Contents in the Final EIS/EIR, but was suggested by the number and variety of the comments themselves. Categories include the following:

1. Comments on the Scope of the Project, on the Definition of Project Alternatives, and on the Project Purpose and Need

2. Comments on Jurisdictional and Funding Issues

3. Comments about Related Projects and Possible Future Projects

4. Comments on Transportation Effects and the Analysis of Transportation Issues

5. Comments on other Environmental Effects

6. Comments on Non-Environmental Issues, including Economic Effects

7. Comments Regarding General Organization of the Document, Graphics, Factual Information Provided, and the Review Process

8. Preferences Expressed Regarding Alternatives

Because comments within these categories overlap to some extent, commenters and decision-makers should refer to the comments themselves in order to find specific responses. For readers who are not seeking responses to specific comments, a review of the Table of Contents will provide the best orientation to this volume.

Contents and Disposition of the Final EIS/EIR

The comments and responses contained in this volume, together with the revised text of the Draft EIS/EIR contained in Volume One, constitute the Final EIS/EIR. Text changes resulting from comments and responses, and staff-initiated text changes described at the end of this volume, have been incorporated into Volume One. Volume One also contains the Final 4(f) Evaluation.

This Final EIS/EIR has been distributed to public agencies and to all those who commented on the Draft EIS/EIR.

Pursuant to requirements of the National Environmental Policy Act, a 30-day public review period for the Final EIS will commence on the date a notice of availability is published in the Federal Register. During or immediately following the 30-day period, the Final EIR will be presented to the San Francisco City Planning Commission for Certification of the Final EIR. Following Certification, a copy of the Commission's Certification Motion, along with any text changes requested by the Commission, will be provided to those who received the Final EIS/EIR. The Certified EIR will be used by state and local decision-makers who will consider approval of the proposed project. Following the 30-day public review period, the Final EIS will be used by the Federal Highway Administration in preparing their Record of Decision.

8. LIST OF AGENCIES AND PERSONS COMMENTING ON THE DRAFT EIS/EIR

The following is a list of agencies and persons that commented on the Draft EIS/EIR either verbally (at one of the public hearings) or in writing. Following their name, in parenthesis, is an abbreviation or last name that will be used throughout the text to identify the source of comments.

- US Environmental Protection Agency, Region IX (USEPA)
- California State Land Commission (State Lands)
- Peninsula Corridor Joint Powers Board (JPB)
- City of Alameda (Alameda)
- Golden Gate Bridge, Highway and Transportation District (GGBHTD)
- Port of San Francisco (Port)
- San Francisco Municipal Roadway (Muni)
- San Francisco County Transportation Authority (SFTA)
- San Francisco Redevelopment Agency (SFRA)
- US Department of the Interior
- Office of Environmental Policy and Compliance
- Sierra Club (Sierra Club)
- San Francisco Tomorrow (SFT)
- San Francisco Planning and Urban Research Association (SPUR)
- Steuart Street Association (Steuart)
- Golden Gateway Center (GGC)
- Lillick & Charles (Lillick & Charles)
- Clocktower Lofts Owner's Association Board of Directors (Clocktower)
- Design in Sync (Design)
- South of Market Alliance for the Revival of the SOMA Environment (SOMA Rose)
- Chinatown Resource Center (CRC)
- Chinatown Transportation Research and Improvement Project (Chinatown TRIP)
- Kaliski, Tof, Spence, and Andersen (Kaliski)
- Koga and Berge (Koga)
- Matsoukis and Duke (Matsoukis)
- Eula Walters of the Citizens for Open Space and to Retain the Vaillancourt Fountain (Walters)
- Michael Alexander (Alexander)
- Merry Goodenough (Goodenough)
- John Gott (Gott)
- Francis Mathews (Mathews)
- Norman Rolfe (Rolfe)
- Niko Letunic (Letunic)
- Reed Bement (Bement)
- Lee Anne Lang (Lang)
- Neal Johnson (Johnson)
- Dehnert Queen (Queen)
- Jon Poschman (Poschman)
- Douglas Lord (Lord)
- Lucinda Means (Means)
- Michael Levin (Levin)
- Clark Manus (Manus)
- Lorita Aarons (Aarons)
- Jeffrey Leibovitz (Leibovitz)
- Louise Bird (Bird)
- Gardiner Hempel (Hempel)
- Sue Hestor (Hestor)
- James Chappel (Chappel)
- Carl Maletic (Maletic)
- Mario Ciampi (Ciampi)
- Enid Lim (Lim)
- Norman Rolfe (Rolfe)
- James Haas (Haas)
- Bob Friese (Friese)
- Warner Schmalz (Schmalz)
- Gordon Chester (Chester)
- Arthur Meader (Meader)
- Dave Gordon (Gordon)
- Alice Rogers (Rogers)
- Marc Paglietti (Paglietti)
- Steve Caramia (Caramia)
- Jane and Jerry Baldwin (Baldwin)
- Gary Lang (Lang)
- Rick and Rebecca Lowe (Lowe)
- Michael Mah (Mah)
- Michael Chung (Chung)
- Karen Pell (Pell)
- Thomas and Carol Burkhart (Burkhart)
- Johnson Chow (Chow)
- Sidney Unobskey (Unobskey)

9. ORAL COMMENTS RECEIVED AT PUBLIC HEARINGS ORGANIZED BY TOPIC

All substantive comments made at the Draft EIS/EIR hearings held before the City Planning Commission or its designee on September 27, 1995 and September 28, 1995 are presented in this section. Comments received at the public hearings are presented by direct quotation, edited to delete repetition and nonsubstantive material only, and are grouped by general subject matter.[1] Marginal notes refer to the location of responses to the written comments. Responses are contained in Section 11, Responses to Oral and Written Comments.

9.1 Comments on the Scope of the Project, on the Definition of Project Alternatives, and on the Project Purpose and Need

11.1.1B I am the CEO of the Small Business Development Corporation. For the record, I have been involved in this particular issue since 1986, and during the time we did our original studies in '92, I submitted an Alternative F that is referenced in the (Draft) EIR document on Page 106, titled "The Single Level Elevated Freeway." Unfortunately, it leaves out most of the facts, and it's factually inaccurate. **II-172**

When you reference the alternative that we put in the (Draft) EIR, you said, "The alternative had gathered little public support." That's not true. When I submitted that proposal, I also went up and down every street in North Beach, Chinatown, Fisherman's Wharf, etcetera, walked and talked to all the businesses in there, and I only had a week to do this. I wore out a pair of shoes. But I got 300 businesses representing 7500 people to sign the petition that this alternative should have been looked at and formulated in the EIR. So when you say it didn't have much public support, it's not true. **[Queen]**

11.1.1B We also asked for - and it's in the files of the Planning Department staff; this is not first time they've heard it - we asked for an intercept garage where the freeway stubs end now. And you're having this land open - South of Market. You get people out of the ramps, especially right next to the terminal - the access loop for the AC Transit. You get people into a garage and **II-173** have a light rail connection that comes there, and you take them up into that corridor. That corridor really could use some additional transit going north-south into Chinatown. It's a hard corridor to have people move in.

---

[1] Consistent with standard Caltrans and FHWA procedures, a separate "Record of Public Hearing" has been prepared and is available for review in the project case file. The Record of Public Hearing document contains the full transcripts of the public hearings on September 27, 1995 and September 28, 1995, as well as comment letters received during the public comment period That document also contains relevant public notices, the mailing list, agendas, informational hand-outs, and other materials associated with both public hearings. Copies are available for review by appointment at the San Francisco Planning Department, 1660 Mission Street.

We're talking about surface (transit). The logical route is use the freeway route; use the land that is opened up. And there is a map in here that shows all of the parcels that have been opened up. And don't trade it off for office buildings, for which there is no need. Use the land to create a transit option, so that you're not trying to figure out how to add more buses on the streets that can't take the traffic. We've been pleading to add transit capacity as part of this project for the past three years. The staff knows it. We've submitted written comments on it; we've had meetings with them. It's not in here, so we're going to give you those comments. And we don't want you to be making a decision right now before you even have the benefit of the public comments on the EIR. We've had Chinatown - and - Enid can talk more extensively on that. We've had meetings with TRIP staff; we've had discussions about what is a rail group that could work on Broadway. How do you get people in the loop through Chinatown? We've had people - the Chinatown TRIP is composed of transit and transit professionals of all varieties. It is not a little organization. It has transportation engineers in it. We have been struggling with this. We told the staff we wanted to work on it. They said we'll do an EIR. Well, it disappeared into the EIR for a year and a half. We haven't had discussions for the past year. And we want the facts analyzed. **[Hestor]**

11.1.1C We also asked for - and this is a controversial issue - there is land that is going to be opened up. If there is insufficient ability to move people into Chinatown, which we believe is the case, we think that the first claim on that land, especially the paired ramps at Washington and Clay, should be a reserve for future transit, light rail. Chinatown has bus lines that are over capacity. The two main lines for Chinatown are the 1 and the 30. If you get on four blocks into the line, you can't get a seat. They are the most heavy-duty, 24-hour-a-day buses in the city. They're immensely busy. There are people who get on and off the Geary and on and off the Van Ness. But if you are stupid enough to go to Stockton to get on the No. 1, you're going to stand most of your trip. You go down a couple of blocks if you want to get a seat, and hope you can get one. And that is at eight and nine o'clock at night. We have asked, when all of these meetings were going on, we want transit. People are not asking for a new freeway. No one is saying: Restore the Embarcadero Freeway. That's been going on for years. But we are saying, move people into the area and do that as part of this project. And if you start out with the wrong analysis and you say there's no impact on Chinatown, you wind up with no solution for Chinatown. And **II-174**

Chinatown has - the 4th Street/Stockton Street corridor is impacted by this. It really is. And it's scoped out; it doesn't exist as a problem. And we are saying that we want - it does deal with what you do with those parcels. Are they surplus property? Or are we, as a city, going to say we might need some light rail to connect from the Embarcadero up to North Beach/Chinatown; get people out of their cars. **[Hestor]**

11.1.2A The key proposal that we are making here is the unification of the plaza, the unification of the waterfront with downtown San Francisco. We took into account the historic background of the behavior of this area with respect to the way it was developed originally, which included, back in 1920, an underpass for trucks and traffic. That was considered obnoxious in those days. It was undesirable, noisy, hazardous and interfered with the well-being of people. So following those experiences and proceedings, you find a way to solve the problem. We concluded that since we couldn't afford a complete underpass, which we tried to build in the early days, that a pedestrian underpass with a split level going up five feet and down 12 feet could accomplish a similar objective. So in doing that, why, we shortened the ramps up here so you only have about 200 feet of ramp on either side, and the entire area here is a sunken plaza. It's not a ditch; it doesn't have retaining walls. And as you can see up here, it's simply a depressed freeway concentrated in this area. By doing that, you actually accomplish the unification of the Ferry Building with downtown San Francisco, which over the history of the building, one can see it has laid fallow, unused, underdeveloped and not attractive to development. **II-175** **II-176**

The key to development of this area down here has to do with addressing ourselves to a transportation center, of which the Ferry Building historically was the focal point and the reason for its existence. And today we need to recognize the importance of that structure and to bring it back into its proper relationship with the city and the availability of people to get to that building and use it. And the better off we use that building, the more successful it's going to be. If we ignore about it and just talk about traffic, nothing will change and it will go on and be the way it is. Now, looking at traffic is a consideration which is only a small detail, and part of what this environmental concern is about. There are really two kinds of traffic that flow in front of the Ferry Building. One is automotive traffic, which is highway traffic, which has nothing do with the plaza. And the other is the F-line which is being built, and that has a lot to do with the area. The F-line is primarily intended for tourism, and tourism is a part of the activity of the plaza. So the first thing one would do is to take the F-line, which is a historic line, and connect it to the Ferry Building so that when people come down to this area, the Ferry Building and the F-line visitors can use it together. Along with that, I would recommend that we bring the steamships down here so that aquatic tourism and land tourism are all unified in this area. By doing that, we will generate the activity, the environmental action that's needed to revitalize that building and bring action into the area.

Unless we do that and encourage the citizens in the most simple and direct way, we're doomed to failure. And these failures have manifested themselves, because we've had our freeway - we had the old Embarcadero Freeway. These are all engineering decisions. No one has addressed themselves to the environmental quality and character. Look at the components properly and relate them. So at the present time, the thought here is not to striate the plaza here. It's about 500 feet from the end of Market Street down to the face of the Ferry Building. At the present time, all the proposals - if I had this in about three steps - you've got a little reach here; you've got this 1250 foot swath that separates the Ferry Building, and you've got some plaza on this side. I maintain that the key to the success of the venture has to do with enabling people to walk 500 feet undisturbed from the foot of Market Street over the bridge and into the building. With the 50 to 60 footbridge, which will easily, easily accommodate that traffic it generates not only from the F-line, but from the steamship terminal, the hydrofoil system, the Ferry Building, the transportation center which is the Ferry Building, is enhanced, it's utilized, it's maximized. And that, in turn, brings people, and these people activate themselves in the area. So that not only is the land side of the Ferry Park activated, but also the Ferry Park as well. If we allow this to go along in the swath of the traffic here, we lose all that. And we also inhibit people from moving through here because of the swath of traffic. So the key to the success of the venture is, no matter what we do, is enable people to walk from here the Ferry Building undisturbed, 500 feet in that direction.

The simple issue here is the people and the water, people and the building, people and their activities moving undisturbed without any hazard at all. And, yet, we can handle that by building an inexpensive underpass, depressing the freeway a little bit here, and putting the - combining tourism. The building is a historic building. These cars are historic streetcars. And the ships that come in have access to it, too. So all this unified together leads to this kind of a solution. **[Ciampi]**

11.1.2A I couldn't agree with you more. I mean, everything you've got there - I mean, the very idea of having our people get off those cable cars - those tourists and even our citizens - and walking out there in the middle of traffic, first of all, they're either not going to go, or secondly, they may get killed. So it's absurd to have that F-line in the middle of the -- in the middle of the highway. **II-176**

I agree with you. And where you've got it is exactly where it should be. And the idea that we're building this transportation center between Main and Beale at Market, and that you can't go from there to the other part of the transportation system, which is the Ferry Building, without walking through traffic just seems absurd to me. Bringing that F-line all the way along those buildings from the Ferry Building all the way up to Broadway would have created at least $75 to $100 million worth of value for the city. Safety. **[Unobskey]**

11.1.2A I want to see the plaza tied in with the Ferry Building; I don't want to see lots of wide, busy highways for the public to cross. I agree with many of the things Mr. Ciampi said, and you, Mr. President. **[Levin]** **II-175**

11.1.2C I know you have a letter in your file from the architect, Warner Schmaltz, who suggests a number of other possibilities for reworking the Essex Street ramps that have some - I think they have some possibilities, and should be studied. **[Chappell]** **II-178**

11.1.2D I would also urge you not to consider the alternatives that call for the additional off ramp that would end up on Folsom Street. The purpose of that addition would to be direct traffic directly down Folsom Street to the Embarcadero. The Planning Department again has envisioned Folsom Street as being street that would be pedestrian friendly. And that's for a good reason. There is a very good view corridor down Folsom Street that includes the Bay Bridge and Treasure Island. In fact, it's probably the best view of the bay in that area. In addition, it is envisioned as being the access to Rincon Park when that park is developed in the future. Turning Folsom Street basically into a thoroughfare that would lead from the Bay Bridge to the Embarcadero would obviously adversely impact the pedestrian use of Folsom Street, as well as the many residents, including those in my building and the other buildings that front right on Folsom Street and nearby. Therefore again and in conclusion, I would urge you to accept the least expensive alternatives and the ones that are most conducive to the continuing residential development of the South of Market area. **[Bement]** **II-179**

11.1.2D The second part that I would like to discuss really is the issue related to the freeway off ramps at Folsom Street. As the Chair of the Transbay Area Plan Citizens Advisory Committee, one of the things that we have been talking about and I would like to have addressed in some way is the issue regarding the Folsom Street touch down. There has been some discussions lately that the ramps associated with the Transbay Terminal are irreparable and must be replaced. Therefore, the question that I have is, is there a possibility that the ramps could actually be touched down **II-180** **II-181** on the southwest corner of Fremont and Folsom? And I guess the last thing then related to that is, I would like in some way addressed or at least identified in some fashion is the analysis regarding the transbay ramp reconstruction. **[Manus]**

11.1.2D The second comment is that we believe that the Fremont Street - the changes to the Fremont Street ramp - on the east end of the Fremont Street ramp between Folsom and Howard are unnecessary. We have been told by CALTRANS that the entire elevated ramp structure along Essex Street and then turning eastward between Folsom and Howard for two blocks must be demolished because it is seismically unsafe, and to spend $6 million for a very short-term fix, when the whole thing has to come down, does not seem like a good use of public funds. And in fact, the same thing could be accomplished by simply restriping Fremont Street and letting people come down the existing ramp and turn right onto Fremont and then left onto Folsom in the short term. In the long term we believe it is possible to come off the Essex Street off-ramp and to turn that off-ramp down and eastward right at Folsom Street and not blight those blocks with an elevated aerial concrete ramp a couple blocks along Essex Street and the mid-block area between Essex and Fremont. There are much more direct, cheaper solutions available that would also have a much better land use effect. **[Chappell]** **II-180** **II-181**

11.1.2D The Fremont Street ramp, this little widow that comes off the existing ramp and goes to Folsom Street. Six million dollars for that one. What's the point? If you want to bring cars to Folsom Street, let them come down to Fremont Street, as they do now, and let them turn left a third of a block. All you have to do is restripe the street. Let them turn left to Fremont Street and - I'm sorry. It's right to Fremont Street and then left on Folsom Street to get to the Embarcadero. You save six million dollars. You save six million dollars that you are going to lose anyhow because that ramp, the existing portion of the ramp as we finally have been able to drag out of Caltrans, is not seismically safe. It's going to have to be torn down because the cost of strengthening it is equal or greater than the cost of rebuilding it. Wouldn't this be a nice opportunity to apply that $40 million that we saved from Second Street to something that would actually be useful? In addition, that ramp can be redesigned so it comes directly down on to Folsom Street because it can start farther back on the hill as the bridge touches down. **[Alexander]** **II-180** **II-181**

11.1.2H Opposition to reconfiguration of Washington Street at Drumm. Leave the street as it is. Widening would displace the pump station located on Ferry Park, which is needed as a childcare center, for restaurants. Widening the street would increase traffic and endanger lives. **II-183**

This area already is rated by the draft, your recommendations, as a Category D, as far as traffic goes, which is unacceptable. **[Walters]**

11.1.2J We would like to see two Class 2 bike lanes in each direction along the Embarcadero. That would be ten feet of roadway space in each direction. That would make sure that cyclists can ride side by side on the Embarcadero Roadway. In addition, we would like to see a Class 1 bike path along the Embarcadero also that would be 12 feet wide. We would like to see the 25-foot promenade also for pedestrian usage along the Embarcadero. We would like to see no parking along the Embarcadero, also, because car doors basically are hazardous to bicyclists, and the present bike lane there, a lot of it is in the space of car doors that do open on up right there, so the present north and south Embarcadero don't have enough room for bicycles on there. I want to make sure the space doesn't get taken away from pedestrian space or open space. A lot of times the Department of Parking and Traffic puts bicyclists in the position of taking away medians from the elderly, taking away sidewalk space from pedestrians or taking away open space from parks. We want to make sure all this bike space is taken away from motor vehicles so that it has a positive impact on the environment there. We are against any new on ramps or off ramps for the freeway. Those are *not* accessible to bicycles. We would like to see bicycle on ramps to the Bay Bridge and then a Bay Bridge bike path, also, over to the Treasure Island and to the East Bay. I would like to ride my bike over to the East Bay, and I know a lot of other people would, also. It would be a nice exhilarating experience on up there. We're able to ride on the Golden Gate Bridge, and I think a lot of tourists that come to San Francisco, they would be able to ride there, and it would be right on the Bay Bridge there. I think a lot of people would rent bikes. Tourism is our No. 1 industry, so the more things that bring tourists to San Francisco would be all the better. So I would like to see good bicycle facilities in the future in the planning on the Embarcadero. And I think we can do a lot better than what we have right here in terms of the Class 3 bike route, which is totally unacceptable. **[Poschman]** **II-184**

11.1.2J One specific point that John Poschman made is that there already is not enough amenities. The existing portions of the Embarcadero already have legally and functionally substandard amenities for cyclists. The bike path that was there and is now there no longer is completely unacceptable. It is dangerous. It is also an invitation to joggers and UPS trucks and everybody else to use instead of bicyclists. That is not a good thing to perpetuate that. I wish that we could have the kind of amenities that John described. **[Means]** **II-184**

11.1.3B With quick regard to the proposed on ramp at Harrison Street, the EIR fails to analyze the logic of an on ramp, other than to just build something with taxpayer dollars. Drivers that would want to use the on ramp would be those headed south on Highway 101 or west on Highway 80. From Downtown, where the majority of these drivers would come, the only way to get on to this on ramp would be to head west on Howard Street, turn left southbound on to Second, then backtrack left and eastbound onto Folsom, then right southbound on to Essex to get on the on ramp. It doesn't make sense. The most important issue here, though, is the opportunity to create a vision for the future of San Francisco. The beauty of San Francisco is not in our freeways. The beauty of the city is in the charm and character of our neighborhoods. Rincon Hill, South Park, and South Beach are historic routes of San Francisco. Long ignored to deteriorate, they are now experiencing a rebirth and a renaissance. Reconstruction of new freeway connectors will do nothing to aid in this development. I ask that you oppose and remove Alternatives 3 and 5. **[Gott]** **II-186**

11.1.3B The other thing I would say is that improved access to Southbound 101 and Eastbound 80 is a fruitless endeavor because the problem is, southbound and eastbound are clogged at the rush hour. You can build five 1,000-lane on ramps in each direction, and it won't help anything because 101 is virtually stopped, and the bridge is stopped. Why build ramps onto them? What's the purpose? Who can tell me? I ask anyone here. What do they serve, other than to suck up $40 million from Washington, which doesn't have the money, except by some legislative bureaucratic statement? What can we do to look sensibly on these building of ramps? **[Hempel]** **II-186**

11.1.3B&C The third comment is it appears that the 2nd Street on-ramps are really unnecessary and ill-advised. And a number of people commented last night that they really don't serve any transportation function, because of the level of service available on the freeway, and in fact they would just have continuing blighting impacts of traffic on - along 2nd Street. **[Chappell]** **II-186**

11.1.3D Alternatives analysis. First, the general rule is that the range of alternatives includes all reasonable alternatives, which must be rigorously explored and objectively evaluated, as well as those other alternatives which are eliminated from detailed study with a brief description of the reasons for eliminating them. For some reason, in the Draft EIS, the DPT variant is not analyzed as a distinct stand alone alternative. There is an apparent explanation for not considering it as a full fledged alternative. The Draft EIS does mention that it is unclear as to whether Caltrans and the Federal Highway Administration could consider this variant eligible for emergency relief funds. Despite the funding issue, the DPT variant is a reasonable alternative that needs to be **II-187** scrutinized with equal vigor to other alternatives in terms of air quality, cultural resources, visual quality, transportation noise, etcetera. In determining the scope of alternatives to a proposal, the emphasis is on what is reasonable, rather than whether the proponent likes or is capable of carrying out a practicable alternative. In fact, an alternative that is outside the scope of what Congress has approved or authorized may be evaluated in the EIS because the EIS may serve as the basis for modifying the Congressional approval in light of NEPA's goals and policies. Therefore, emergency relief funding should not be determinative. Economically and technically, the DPT variant is a reasonable option. It should be treated as a sixth alternative with equal weight.

Closely related to the alternatives analysis are the screening criteria used to select alternatives during the scoping process. In this Draft EIS, the screening criteria are vague. The reasons for eliminating some of the alternatives rely on factors, such as physical constraints, cost, and lack of public interest. However, no measures of their relative importance are given, and no standard screening criteria are provided. There is no discussion as to why the DPT variant is not treated on an equal footing to the other five alternatives. The uncertainty of the emergency relief funding is noted. However, this should not be the sole basis for excluding an alternative and apparently did not provide a basis for eliminating Alternatives 2 and 4, which were identified as incapable of obtaining emergency relief funding. **[Goodenough]**

11.1.3E I live in San Ramon. I think we've heard the San Francisco resident view of this project. I need to remind you that this is a regional project. It is a replacement of a state highway that was intended to provide some reconnection of the capacity and connectivity to the Embarcadero and to the northeast waterfront area. I feel that the views of San Francisco residents have subverted the regional nature of this project. I believe that the intent, as evidenced by letters from the CTC, MTC, the Federal Highway Administration, indicate that they desire some replacement of the capacity and character which would bring automobiles toward the Embarcadero Roadway. I agree with many of the other people in that the alternatives presented are not good. There are no alternatives which provide this connectivity. There is a distinct lack of interest in providing the region with needed transportation service, and I will detail my objections in a letter forthcoming. **[Johnson]** **II-188**

11.1.3E I think I know all these public hearings are mostly a dog and pony show, and they are literally useless because you don't listen ever, and I am convinced that the only way we are going to have the public find out what City Hall is really doing and for whom is to go to court. And you **II-189** have to go to the end of the process. And so we're going to have a dog and pony show all the way up until next spring until you finally rubber stamp the plans that were laid out many years ago. But I think people are starting to wake up in San Francisco because of talk radio and other points of reference. And even there is an article in the paper recently that many of the environmental and transportation groups have reversed their position regarding BART, etcetera. I think you're going to find that once people start catching on to what is really going on in San Francisco, that your plans are to kill the northeast quadrant of San Francisco by cutting its throat or removing transportation access for goods and services and that your transit plans are completely incapable of carrying the number of people you expect to be in that area over the next ten years. I know that. You know that. The public is clueless. And I'm saying that there are superior alternatives. **[Queen]**

11.1.3F Although I am speaking as a private citizen tonight, I want to stress that I am a member of the Transportation Authority Citizens Advisory Committee. I'm a member of San Francisco's Traffic Safety Coalition, and I am also, as you might guess, a cyclist. I am the chairperson of the Bicycle Advisory Committee which serves the Board of Supervisors. But, again, I am speaking as a private citizen. I have several statements and several questions. I guess you could say they are rhetorical because you are not going to be in a position to be able to respond to any of the questions. But the first that I would like everyone to ask themselves is, why is it a good thing to bring more cars into this city under any circumstances for any reason? There is approximately 500,000 registered automobiles in the city that belong to the residents of the city. That's more people than are registered to vote, I would also like to point out. There are approximately 233,000 legal parking spaces in this city. That means that we are already at twice times capacity before the commute starts. Why is it a good thing? Ask yourself. Do we need more dirt, more danger, more noise, and more diminution of air quality and quality of life in all the neighborhoods, not just this neighborhood? There is also a diminution of civility that the last speaker referred to, that people start getting, shall I say, testy? No, homicidal is probably more accurate. I am out there every day. I work in corporate America, and I work in the financial district, and I come from close to Golden Gate Park every day. I have scar tissue up and down my legs from eating it because of cars. Diminution of civility doesn't even come close to describing it, and all of these alternatives, except the no build, are saying, yes, it's good. Let's bring more cars into this city. There is no room now. The quality of life of everyone who lives here and anyone who comes to this city is diminished significantly because of automobiles. I am not saying they are the scourge of the devil and that they should be eradicated from the face of the Earth. I think private automobiles do have a place in the transit mix, but we should **II-189** be concentrating on alternative modes. As Norm put it, this is a transit first city. We need to pay more than lip service to this. And if it means abdicating the chance to grab some federal dollars, so be it. It is not necessarily a good thing to enhance a car-based transit system here.

One speaker said that this was a regional project, and that very effort should be made to get as many cars into the city as possible. He doesn't live here. He works here. He is only here eight hours a day, and he is maybe dealing with getting into the city for 20 minutes or an hour in the morning and getting out of it in the evening, but the rest of us live here. We have to put up with the pavement and the dirt and the noise and the pollution and the danger and the traffic signals and the money that our tax dollars pay for so they can drive into our city. They want to come here, great. You can carry a wallet on a bike, on a ferry, on a bus, on a trolley, on CalTrains, on BART. You do not need a car to come into this city and spend money and to work. You can take transit. And, lastly, one thing that did strike me is, it's ironic that Ms. Kohlstrand was referring to all of the things that are in here as improvements. Why is it an improvement to bring more dirt, danger, noise, and pollution into this city? Why is that a good thing? **[Means]**

11.1.3F I have concern for the people who live south of Market, who don't want to see traffic increased in their streets by building newer ramps. And I certainly agree with Mr. Rolfe. This should be a Transit First city. That's supposed to be our official policy. Let's not do anything to encourage more vehicle traffic. **[Levin]** **II-189**

9.2 Comments on Jurisdictional and Funding Issues

11.2G The reason for the Second Street ramps in traffic terms seems obscure, but in financial terms, if I understand it correctly, is that it creates a rebuilding of the amount of the ramp capacity which existed before the terminal separator ramps came down. We think that's a terrible reason to spend 40 some odd million dollars to build ramps. As we understand it, the reason for putting in the Second Street ramps is that it would freeze up enough money to complete the Mid-Embarcadero. Well, financially that may be okay. Under the rules that exist - those rules were made by rational people for rational reasons, I'll assume, to cover most situations. They don't cover this situation. This is an opportunity, and this is the time when we need to break through regulations that were designed to apply nationwide and apply some common sense. This has been done before. In fact, this was done on this project. The Mayor sat down with the Secretary of Transportation and arranged that money that was going to be lost unless we rebuilt the terminal separator ramps exactly as they had been designed decades ago, something that very **II-193** few people wanted. That money was going to be lost. We got an agreement that that money wouldn't be lost if we came with another plan. Well, we have come up with another plan, and we have the opportunity to come up with a plan that is really good. If instead we're forced to spend $40 million to build ramps so that we can complete another part of the project that everybody likes, there is a disconnecting logic, and what needs to be done is to sit down with the Secretary of Transportation, explain what the problem is, to sit down with the Vice President and say, "Here is a chance to reinvent government," and to say, "How do we free up this money so it can be used in a logical common sense way?" **[Alexander]**

11.2G And incidentally, as it turns out, your staff says that they are the worst performing when there's incidents. You also read the EIR to find out they don't look so good from a traffic viewpoint when things are normal. The one that looks the best from the traffic viewpoint when things are normal is No. 2. If you look at your table, you'll find traffic speeds are actually faster and there are fewer intersections that run the or "E" with that one. 4 might possibly be all right because it doesn't seem to add to traffic on 2nd Street or 4th Street. So then we have a problem. It says we're being told there's funding problems; no money is going to be available if we go for 2. All right. That means we wind up with a no build because the F-line can be built, anyway, from other source of funds. And we just sit there with things as they are for a while, and then the money will materialize. I also want to remind you, San Francisco has a tradition of turning down federal highway money when it turned out it appeared it was doing bad things for us. If we just want to follow tradition, we would say this is the way we want to go: if the feds don't want to produce the money, well, that's the way it goes. **[Rolfe]** **II-193**

11.2G I just wanted to make a slight addition to my comment about the construction of ramps. It appears that the - in a document that the - one of the major purposes of the 2nd Street ramps is to free up money to complete the Mid-Embarcadero Freeway - Roadway. And I hope it is correct that the Federal Highway Administration can see their way around these rules, because the whole reason we're here tonight is because the City of San Francisco changed some rules that didn't make sense, some national rules that didn't make sense. And I hope that, again, that an alternative is not selected just because it's the fundable alternative, and that if this is the case, that the City do just what happened the last time, and that is that the Mayor meet with the Secretary of Transportation and rework these rules so that they make sense in this case. **[Chappell]** **II-193**

11.2G I agree with those who say we can't let the financing control what this project becomes, what alternative is chosen for something that's so important it's going to be with us into the foreseeable future. I think money is used as an excuse for doing so many things. I'm a little overwhelmed by the topic. But the number of kiosks on Market Street - I'm having a hard time with that. And this is all because of money. I agree with Mr. Rolfe. If the money is not going to be there for what the City should or wants to do, let's not do anything for a while and see if we can get some money down road. I don't want to see a mistake made, like many mistakes in the past, including all the freeways that we have had and have been sorry about. **[Levin]** **II-193**

9.3 Comments about Related Projects and Possible Future Projects

11.3.2 I live in the area of Mid-Embarcadero, and I am here to speak specifically against any building or any roads being permanently placed on Ferry Park, which known to you as Blocks 202 and 203. I represent a group of over 2,000 people who live, work, and play in that area; I formed the group, and I'm its formal representative. This group requests that Ferry Park remain as soft scape open space for recreational purposes and that no buildings be placed upon it. The reasons? One, Planning Code 139 requires that this Downtown area be set aside as a park. Two, Ferry Park is not intended to be sold off under SB 181. Childcare must be placed inside the Embarcadero Center buildings and in the Maritime Plaza level buildings, not on Ferry Park, as mentioned in the report. Four, a playground for kids with swings, slides, exercise bars should be placed on Ferry Park to accommodate the several existing childcare centers in this area. Maintenance of Ferry Park should continue by the Recreation Park Department, as it has been done so for the past 30 years. **II-196**

Comment on the human use of Ferry Park published in the draft. The opinion by the above-captioned group is that this report is a great continued effort by the draft people to sell off Ferry Park, which you have been promoting for the past four years, to sell it off, take the money, and buy cement to put on Justin Herman Plaza or on the roadway. That's not a fair trade off to take the only soft scape park, open park in that area - a public park I'm talking about - and trade it for cement. We need a park down there. It is the only park that is left. Expand the east side of Ferry Park as part of Justin Herman Plaza - Absolutely not. Justin Herman Plaza is overseen by the Embarcadero Center people, and they have done a lousy job on it since they have had it over the years. As Reverend Tu Tu said in July when he attended the 50th Anniversary of the United Nations, and I quote, "We need trees, birds, green grass." **[Walters]**

11.3.2 I am a representative for the Golden Gateway Tenants Association. We are a residential community connected to the Embarcadero business area. We are opposed to any building, including garages, on blocks 202 or 203. That's the open green space between our two centers. We want open green space to be used for active and passive recreation, and we will be following this with written comments. **[Aarons]** **II-196**

11.3.3 But one of the questions I have now is, there is a lot of activity and development going on. There is more residential going on, and there is also talk of putting both an arena, 22,000 seats, and a baseball, whatever it is, stadium, 50,000 seats, which when you consider what the road and the infrastructure can provide in terms of automobile traffic, it's non-existent, especially for that many people with the impact on the residents, as well, coming into that area. And the other problem is that the city government keeps saying, "Well, they can take public transportation," and there is no public transportation, especially if you live in Pacific Heights or the Presidio or any of those areas. So in consideration of trying to put that type of use in the area and wondering if those plans have been considered in these roadway plans, it seems to me that one of the options that was presented tonight was to have a connecting ramp on 280 at King Street because I have heard that about 75 percent of some of the fans that come to these games come from the South Bay, and there is really no way for them to get to that area, which would be at the end of Second Street. They want to put that stadium at Second and King Street, which is right there, and there is no way for people to get in there. And because of the traffic problems already, I think you're looking at a nightmare. **[Bird]** **II-197**

11.3.4 I close with one more remark. This is something you really have to change in the terminology used in the EIR. The Muni Ferry Bus Terminal is never referred to by its correct name in the EIR. You use terms like the "layover," the "bus parking lot," and so forth. This question came up in the course of the Transbay Terminal Area study, and they did indeed correct it. It's known in that study as the "Muni's Ferry Bus Terminal", and I respectfully request - in fact, I urge you to change it everywhere it's referred to in this EIR as the "Muni Ferry Bus Terminal," and I will try to get a list of those things to help you out, but that's got to be done. **[Rolfe]** **II-198**

9.4 Comments on Transportation Effects and the Analysis of Transportation Issues

11.4.1 I'm the attorney for the Chinese Chamber of Commerce, Chinatown TRIP and the Chinese Resource Center. We all have been participating in the process of the Embarcadero Freeway **II-200** **II-208** replacement, and have tried to get the Department to focus on some of what we believe are key issues with regard to replacement of the Embarcadero Freeway and the Terminal Separator Structure. Namely, how do you move people in and out of the northeast corner of San Francisco? This EIR does not give you the information that we asked for, and it is a document that's troubling. **[Hestor]**

11.4.1 And what this EIR winds up talking about is all of the new homes, all of the new businesses on Folsom and Harrison, and how they are affected. And it micro details impacts of the various alternatives on whichever way the ramp goes on people on Folsom Street and Harrison Street, and it leaves out the base problem, which is this is supposed to be an EIS/EIR about how we're going to return people-moving capacity to the areas that lost the freeway. And that is missing from this document. It's missing from this document in an almost insulting way. **[Hestor]** **II-200** **II-208**

11.4.1 There is no impacts on Chinatown. It tells you in this EIR. And anyone who just did as I did, and came through Chinatown, saw Stockton Street is jammed all the way up every day until about six or seven in the evening, all the way practically at Broadway Street. Why is Stockton Street jammed? Because 4th Street is the first place you can get on the freeway if you're going south, and a lot of people go south. And so they jam from 4th and Harrison all the way up through - in an area that isn't in your study area. The study areas ends at Broadway; it doesn't talk about the traffic patterns that have altered. We're going to put this in writing, because it's much too complicated. But as a starting point, this is not a decision-making document that you can use to help sort out Chinatown, North Beach, Telegraph Hill. the North Beach Waterfront. We thought that was the document we were going to get, and that is not the document we got. **[Hestor]** **II-200** **II-208**

11.4.1 I'm here representing Chinatown Transportation Research and Improvement Project. We are a grassroots group, much concerned with traffic circulation in the northeast sector of our fair city. And we were just appalled, totally dismayed, at this Draft EIR because it doesn't address us much. And one of the most impacted areas, after the tear-down of the Embarcadero Freeway, was those people west of the Embarcadero Freeway, which is the northeast sector of San Francisco. And not only are all the replacement alternatives put forth by the Department incomplete and unsatisfactory, but opportunities for community input and public approval have also been - are also totally inadequate as regards this Draft EIR. We've had, as the previous speaker said, six years of talking and cajoling and meeting after meeting after meeting with every agency possible, talking about what were things that were needed to bring about people **II-200** **II-208**

- people moving traffic back into the northeast area of San Francisco, and yet it's not addressed in this EIR. **[Lim]**

11.4.1 We wanted adequate information the impacts on the traffic both before and after the freeway demolition, demolition - first of all, the closure - on how the traffic problems have changed on Stockton Street. And the study area truncated the area. And this isn't in the EIR. We asked for that information. **[Hestor]** **II-200** **II-208**

11.4.1 One of the things that is missing from this that would have been helpful information is how people got onto the freeway before; what were the volumes that came down? I mean, just how do you approach the Embarcadero Freeway? I know how the signs coming down Battery Street because I used to travel that way, but you shouldn't have to rely on experience to understand the setting. How traffic moved historically - if I don't have it, CALTRANS has it. How much traffic came on Sansome Street? How much traffic came on Battery Street? How much traffic turned west - pardon me - turned east on Clay Street to get on the Embarcadero Freeway? You need that information, and you also need that information with numbers and arrows for the alternatives, because what we asked for and we didn't get was an expanded scope that talked about how traffic traveled through the northeast corner of this city. **[Hestor]** **II-200** **II-201**

11.4.2A One other major one is that the EIR failed to note anywhere that the off ramp would be directly across the street from the Clock Towers 100 plus car garage. I ask all of you here today to envision a freeway off ramp into your own homes. **[Gott]** **II-208**

11.4.2B The Second Street ramps I think are undesirable and a mistake. They create conflicts between east and west commuter traffic. Instead, we think that using Fourth Street and King Street on ramps for Peninsula traffic and First, Essex, and Sterling for East Bay traffic allows a separation of cars that are trying to go to the Peninsula and to the East Bay, so that they are not crossing on, for example, Harrison Street, which will be severely impacted by building the Second Street ramps. **[Alexander]** **II-209**

11.4.2B The only down side I have found in living in the area is the traffic, and I think perhaps the suggestion here that your traffic data may be out-of-date might be understated, just as the previous speakers might have understated their description of the traffic because it is an absolute disaster. I work in the East Bay and try to avoid coming into the area of my home between the hours of 4:00 and 7:00 because it is almost impossible to get through that area. As **II-208** **II-209** one previous speaker mentioned, it's very, very difficult to get in and out of the Clock Tower building at that time because of the existing traffic primarily getting onto Harrison Street so they can get on to the bridge. Now, whoever did the traffic study they're maybe either out of date, or they may have had their eyes closed at the time because if you have the last off ramp to San Francisco dumping traffic onto Second Street there, it would be impossible. As I came out of the building this evening - it was about ten minutes to 6:00 - the traffic going in the northerly direction on Second Street there was stopped. It was barely moving. That's typical. The people get very testy because they are late getting home, and so they drive differently. They take chances. They cross over the double line on Second Street in order to get around people. Going the other direction, I have been hit almost a couple of times by people doing that. So if you increase the traffic by dumping this on ramp onto the that street at that time, you would just cause an absolute disaster. I can't stress that strongly enough. It's impossible as it is now, and it would just be awful if this was done. So, again, for those reasons, it's a wonderful area except for the traffic. Please don't do anything to increase the traffic in the immediate area of those residential and commercial uses. **[Lord]**

11.4.2B I am a prisoner of traffic in South of Market. I noticed the speakers previous to me seem to represent the Clock Tower, the Hills Plaza, and maybe a few other small residential areas in this conversation. I just wanted to say that on any given day, Second Street and Third Street is gridlock all the time and that any further traffic impacting of our neighborhood is going to be negative, and that it's not just a five-day week. It's also weekends with 49er games and Giants games impacting the neighborhoods. I am a bicyclist, a pedestrian, and, again, a prisoner of traffic. I just wanted to let the powers know that I am a resident, a tax payer, and I do not want any more traffic impacting my neighborhood. **[Leibovitz]** **II-209**

11.4.2B To the surprise of some, I don't live in the area we've been talking about, but I do travel through it. And I would like to say that anybody who believes that an off ramp on Stillman to Second is sensible hasn't stood at the corner of Second and Stillman ever. It's totally counter intuitive and objective and logical, counter logical. It just can't handle it. **[Hempel]** **II-209**

11.4.2B Second, the traffic counts discussed in the Draft EIS are from 1993. I submit to you that the traffic has increased substantially since that time. More recent data needs to be provided. **[Goodenough]** **II-208**

11.4.3C It also doesn't grasp the very basic notion that as you increase capacity, you also increase traffic. Now, every single time that San Francisco has come up with a policy on this issue, the policy has been to reduce traffic. We are not talking about reduce automobile congestion. They are two very different things. Congestion impacts automobile drivers. In and of itself, that is a good thing because as congestion becomes unacceptable, to use your term, people don't drive. They avoid discretionary trips that they easily could, or they start taking transit, or they start riding their bikes, or they start walking. I just want to read you one very quick note that I found in the paper that referred to the mess at Devil's Slide several months ago. Here's a woman, Gerry Ann Jervick, cook at the Three Zeroes Cafe at the Half Moon Bay Airport, has given up driving the four miles to her morning aerobics class. "Fighting that traffic jam was taking me an hour, so I started riding my bike." This is how transportation works in the minds of most people, and transportation planners don't get it. This EIS/EIR has a complete bias for automobile transportation. And the handout that you gave me has several pages on the level of service of different intersections. Traffic planners will tell you to an exact detail what the level of service is for an intersection. They will not tell you, though, what the level of a neighborhood's frustration is with that traffic. They won't tell you when they have enough cars going through their streets, when they have had enough car alarms going off, enough air pollution, enough motorists threatening at the sidewalks. This is not addressed in the EIS/EIR at all. **[Letunic]** **II-214** **II-215**

11.4.4A As I pointed out in a March 16th letter to Barbara Sahm, the proposed Second Street off ramp does not provide sufficient room for an exit only lane and off ramp. On Page 270 of the EIR, a reference is continued to be made to an 800-foot on-off ramp when, in fact, the distance that I marked off was closer to 600 feet. On Page 270 of the report, reference is made to average queues at Second Street off ramp of about three vehicles per lane during peak hours, but on the previous page, 269, a statement is made that approximately 850 vehicles during a.m. peak hours would exit I-80 and 85 percent would turn left. This translates to 12 cars per minute exiting on to Second Street. To get the average of three vehicles queued, the light would have to clear every 30 seconds or something near there, too. If Second Street were consistently clear, this might work. The matter of fact is, though, however, that Second Street is rarely clear in either the a.m. or p.m. peak hours. Furthermore, at p.m. peak hours Second Street is almost fully blocked by traffic queuing to get on to the bridge. At this time of day, having a last San Francisco exit off ramp dumping on to Second Street will cause gridlock on the freeway as cars exiting off the freeway will be left with the option of waiting to either be rear ended or continuing on to the East Bay which was not their destination. **[Gott]** **II-216**

11.4.1 Chinatown TRIP. What Miss Hestor said just previously is what we have been doing. We have been working with the City in many different capacities. I'm surprised there isn't anybody here from Muni, because one of the things that will be greatly impacted with a lot of these alternatives is the impact on how Muni will travel. And we have a number of lines going on 3rd and 4th Street that will feel the impact if you put more vehicular traffic onto those streets. **[Lim]** **II-204** **II-206** **II-208**

11.4.5C The policy of San Francisco is supposed to be transit first. And in line with that, we should be doing all we can to reduce delays to, and interference with, public transportation. Conversely, we should not be doing things that might be causing those things to happen. So therefore, I have problems with alternatives that include ramps on both Second Street and Fourth Street. Fourth Street is already a mess. There are some very important Muni trunk lines that use Fourth Street, and they are already being screwed up by the freeway traffic at Fourth Street, existing Fourth Street ramps, and I would not want to see anything happen that would increase traffic using Fourth Street to access the freeway, especially the on ramps. That's what causes most of the problems. The off ramps - well, if a backup occurs on a freeway. If it occurs on a street where the Muni runs, that's not okay. Second Street. Well, there is one Muni line there now, but it has some possible future use as a transit street. The Bayshore Corridor Study is underway. One of the alternatives being studied is an off surface alternative. I have suggested, and I understand from your staff other people have suggested that when it comes up Third Street at about Brannan or Townsend or somewhere, it's going to jog over to Second Street somewhere and come up Second Street to avoid the big traffic jams that are on Third Street right now. And I would not want to see more traffic put on Second Street. I would like to see that remain transit and a local commercial street, which is what it is right now. **II-223**

I'd like to remind folks that supposedly "Transit First" is the policy of this city. And we should not be doing - we should be doing all we can to reduce the ways to cause interference with public transportation. For those reasons, I have problems with the alternatives that include 2nd Street and 4th Street ramps. 4th Street is a very busy street with three Muni trunk lines which are already subject to great delay times because *of* the freeway traffic backing up there. And we should not be doing anything that would increase that. In fact, we should be doing whatever we can to decrease it. 2nd Street also poses a problem. There's one Muni line on it now, but I see a possible future use for 2nd Street. 3rd Street light rail, Bayshore light rail, is now under study. And one of the alternatives being looked at is an all surface one. I've suggested if they go all surface, that they should go over to 2nd Street at about Brannan or Townsend to avoid the big **II-223** mess you have on 3rd Street. So that means Alternatives 3 and 5 are no good, if you look at it that way.

If you also look, the descriptions of the transit lanes on First Street on Fremont Street are a little fouled up there. On 1st Street, they refer to a movable transit lane. Well, you've got a streetcar track on 1st Street, so it would be kind of hard to move the lane back and forth at different times of day. So that has to be reviewed. On Fremont Street, their text describes how the transit lane would work. Then there's a drawing to illustrate it. The text and the drawing do not agree. The drawing presents an almost untenable situation, where Muni's F-line cars would not be able to use the aisle at Fremont and Market streets in case of that. **[Rolfe]** **II-221**

11.4.6A If the Second Street off ramp is constructed, pedestrian traffic on Second would also be affected. As the only tree-lined street between Downtown and South Park and South Beach, the street is a natural path for pedestrians with destinations to the south end of San Francisco's developing waterfront. An off ramp on the west side of Second Street will force pedestrians to the east side of Second. At the corner of Second and Bryant, these pedestrians would then have to cross Bryant at an intersection where traffic is either speeding up Bryant to head on to the Sterling Street on ramp or often speeding up Second Street from South Beach to turn right to get on to the Sterling Street on ramp. For pedestrians crossing at Bryant and Second Street, the eastern crosswalk is the most perilous, but the most logical is if the proposed Second Street off ramp exists on the west side of Second Street. There are many more arguments against the off ramp. **II-223** **II-227**

When we bought into the Clock Tower, it was pretty obvious we were located next to the freeway. That's not the issue here. The issue is increased risk to those that like, work, and enjoy walking in this growing residential neighborhood. An off ramp into this residential neighborhood would cause an increase to all those risks. **[Gott]**

11.4.6B The build alternatives propose narrow sidewalks in several places. It does away with the Davis Street landscape sidewalk area. And this is a huge pet peeve of mine. It proposes to widen a lot of streets. It will squeeze more lanes on to lanes that are currently wide. Your EIS/EIR does not address the impact on bicyclists. When you have a wide lane, a car and a bicycle can pass, can share the road safely. When you squeeze two lanes, suddenly bikes are nowhere to be seen because if you take up your lanes, for safety reasons, the cars will honk at you **II-228** mercilessly. Your EIS/EIR does not address this. How do you expect to reduce automobile traffic when you are not doing anything for bicyclists or pedestrians? This is insane. **[Letunic]**

11.4.6C I was a member, as many other people here, of the Citizens Advisory Committee on the Embarcadero Project for several years, and my main concern during the meetings of that committee was urban design, the design of the plaza in-front of the Ferry Building specifically. And I still have hope for that, even though there have been lots of changes, some negative, in the original conception of that. When I look at the alternatives, just skimming over it, again, with my concern for the plaza, the drawings show that Alternative 5 does have quite a noticeably larger plaza. It appears to be anyway between the two roadways, but I am not sure I would want to go with that alternative just because of that. And I am not sure I would want to have any of the roadway, even the one direction, directly in front of the Ferry Building, as opposed to in the alternatives where both directions, where they are paired, but they are curved away from the Ferry Building with a plaza directly in front of the building. That's what I have always favored. **[Levin]** **II-229** **II-230**

11.4.6C The configuration of the Mid-Embarcadero Roadway breaks down into two alternatives: Alternative 3, with a paired, curved roadway, with a small plaza directly in front of the Ferry Building; Alternative 5, a split roadway and a large plaza splitting northbound and southbound lanes. Alternative 5 provides easy pedestrian access to the waterfront by splitting the roadway into two thinner roadways. At the same time, the plaza would function as a central transfer hub for ferries, the surface LRV's and possibly for the California Street cable car line. Justin Herman Plaza would remain as it currently is, an effective people-gathering place. In comparison, a compromise, Alternative 3, which divides the entire open space, creates a barrier to pedestrians wider than Van Ness, and eliminates any possibility for a grand plaza adjoining the Ferry Building. The current configuration of the roadway is, essentially, a split roadway, which appears to be working just fine even despite the Muni Metro construction in the area. The split roadway is not only moving traffic but creates ample space for such activities as we currently see, such as the Farmers Market. It is our considered opinion that Alternative 5, regardless if it's 5 A or 5-B, as it's relating to the on/off-ramps of the freeway, that the split roadway would actually save time in design and construction and be a superior design solution. **II-229** **II-230**

The Mid-Embarcadero plaza should not be some work of pop art, but should relate to the beaux arts design of the Ferry Building, the convergent nature of Market Street, the Embarcadero and the Bay. A divided roadway would facilitate this. After the Great Earthquake and Fire, the angular quality of the streets there north of Market and south of Market had the opportunity to be united in a world class plaza where, quote, "the city's grandest boulevard meets the bay." When the city was reduced to ashes, the street plan remained disjointed and the opportunity was lost. After nearly five years of community participation, planning studies, environmental studies, Redevelopment studies, Municipal Railway studies, Planning Department studies, Recreation and Park studies, feasibility and financial studies, ferry capacity studies, and endless votes by the Commission, the "City that knows how" is about to opt for a compromise of a compromise which would bisect the space through the middle, with a 131-foot-wide surface roadway/rail configuration, literally cutting off the city from its own waterfront. **[Maletic]**

9.5 Comments on Other Environmental Effects

11.5.1A I'm speaking to you tonight as a founding member of SOMA Rose, which is an organization of neighborhood residents and businesses in the South of Market neighborhood Second and Bryant Streets. The mission statement of our group is the revival of the SOMA environment, and I think it is also appropriate that you chose this location tonight since it is so close to the area impacted by these alternatives that you describe because a lot of the same energy and enthusiasm that people now have with the Museum of Modern Art down here, we have in our own neighborhood at Second and Bryant Streets. Warehouses that were abandoned for 20 or 30 years have now been converted into residences like the Clock Tower Lofts. Other buildings have been converted to small businesses. So there is a lot of energy and enthusiasm in our neighborhood, as well, and I think we can work together and not split us by bringing a freeway off ramp right through the center of it. Any of the things in the EIR we have problems with, we will address those separately in a written document, but the main reason I wanted to come up tonight was just to let you know of our support for the DPT variant, and we look forward to that, pursuing that. **[Mathews]** **II-234**

11.5.1A The area south of Folsom has been designated by the Planning Department as being for primarily residential development. And I think that should be the focus of the decision that is made on this particular matter. Alternatives 1 and 2 will have the least impact upon the existing residents and on those residents that will be there in the future. As I am certain you are aware, there are a number of additional projects in the area that are now under construction or are planned and will be started shortly. This is one of the, probably one of the few areas that the Planning Commission, the Planning Department can truly claim as a victory. The city invited residents to move to the South of Market area beginning in 1985, and the developers **II-234** responded to that invitation as have many of us who now live there. You've heard about the adverse impact from the people who live in the Clock Tower in that area already concerning the increased traffic, noise, and the other problems that would be created by particularly the Second Street ramp, and I would urge you to not consider any of the alternatives that include that alternative for those reasons. **[Bement]**

11.5.1A I live at 461 Second Street, which is the Clock Tower Lofts. I am opposed to Alternatives 3A and B and 5A and B. I think when I look at Second Street, I really see it as a symbol of everything that's great about our new South of Market area. It attractively blends together businesses, residences, restaurants, trees in an attractive package that encourages pedestrians to use that as their corridor between the Downtown area and the South of Market area. The addition of the Second Street off ramp and then the recreation of the Harrison Street off ramp would seem to drastically increase the traffic on Second Street and with a negative impact, both visually and environmentally on the neighborhood. I urge you to give strong consideration to the alternatives other than three and five. **[Lang]** **II-234**

11.5.1A I, too, live at the Clock Tower building at the corner of Second and Bryant. I want to speak in opposition to Alternatives 3 and 5 for the following reasons. My wife and I moved to the Clock Tower about three years ago, and we were attracted to that area, as many people were, by the exciting mixture of residential and commercial uses that are going on there, the restaurants, and as an ex Planning Commissioner in the East Bay, I would like to compliment the planners amongst you for doing such a good job in planning that area and promoting the uses that are there now. The residential is still increasing. There are lots being built as we speak in the area to bring new residents into the area, and, of course, as you know, the businesses that are coming into there. **[Lord]** **II-234**

11.5.1A I have been in the South of Market area for about 14 years and have seen the place completely change. Now there are pedestrians walking up and down the streets and all over in the Embarcadero. It's wonderful the way it has been rebuilt. But I also wanted to let the people who really plan these projects, I don't think they really know that there are people down there living because I have been to meetings before where they say, "Oh, there is nobody living South of Market." And the fact is that there are 10,000 residents who have moved in there since the Eighties. So That's quite a significant growth, as well as $600 million in residential **II-234** improvements have been made in that area, which is quite significant as a tax base for the city. **[Bird]**

11.5.3A The most recent air quality data is from 1993. It will be almost three years old in a couple of months. Yesterday I called the Bay Area Air Quality Management District and discovered that 1994 data is available and that 1995 data will be available soon. **[Goodenough]** **II-238** **II-239**

11.5.4D I also submit to you that the cumulative impacts are also insufficient, especially when discussing noise levels. Currently, the Clock Tower is located in an area that is measured for 83 decibels, yet your construction recommendations are that no new construction be conducted when decibels are from 65 to 90 decibels. In summation, there is a legally insufficient alternatives analysis, legally insufficient cumulative impact, and there is a woefully insufficient amount of current data on environmental impacts.**[Goodenough]** **II-245**

11.5.5 The incomplete information and data. You have a duty to obtain information and data and include it in the EIS if costs are not exorbitant. In several instances, the Draft EIS relies on outdated information to reach conclusions about environmental impacts. For example, the latest hazardous waste studies took place in April of 1993. The Draft EIS even relied on some data collected as long ago as 1990. **[Goodenough]** **II-246**

9.6 Comments on Non-Environmental Issues, Including Economic Effects

11.6.1 Open space is extremely precious in this city. One thing that is very good about San Francisco is that there is a lot of open space. Even in Downtown, there are little pocket parks all over the place, albeit most of them being private. But no one seems to even care that something that is a wonderful vital aspect of the Embarcadero is just going to be wiped out just like that. I am talking about the Saturday market. That is so much superior to what was there before, namely that stupid freeway, words fail me, not for very long, but they do fail me. I mean that is something that brings jobs into the area, that brings good fresh produce into the area, and makes the tourist go bananas. They can't wait to spend money here. And that's what we're supposed to be doing. That's human space. It's open space. Don't take it away. And if you do any of these alternatives, it's gone. It's not even going to be a happy memory. You know, there's lip service being paid to, oh, well, maybe we will relocate it. Right, and pigs might fly, too. That's not going to happen. It's going to be gone. **[Means]** **II-257**

11.6.2 The group opposes the environmental draft recommendations, such as that parking garages be placed under or on Ferry Park to satisfy the financial needs of the Port or for any other reasons. And the reason for this opposition is that every form of public transportation leads to the Ferry Building. There are already more than enough parking garages in this area. More garages means more traffic, hence more pollution. The existing soil is fill, unstable and polluted. It has been estimated that underground parking would cost over $50,000 per parking space. Parking is free at this time, in the Embarcadero Center garages and other garages in that area after 5:00 p.m. and on weekends. **[Walters]** **II-258** **II-259**

11.6.2 In regards to parking, on Page 344, we find a statement that there has been a shift to transit because employment has increased faster than parking supplied. This has improved air quality. Well, that's a big argument against this proposal for the Port to build a garage somewhere in this vicinity. we don't want to have more cars. We don't want to have more traffic in there, which the thing would generate. If the Port needs more revenue, they should be looking to maritime uses or other industrial uses on the waterfront. For example, the LRVs, the new street cars the Muni is getting are being assembled on Port property. The CalTrain cars presently being used were assembled on Port property. That's the sort of stuff they should be looking to, rather than parking as a source of revenue. **[Rolfe]** **II-258** **II-259**

11.6.2 Instead, we're concentrating on things like, oh, well, we have to reimburse the Port 25 to $30 million for the income that they have for those parking spaces they are going to lose. Why is it a good thing to reward people for having an attractant of what is a nuisance? Automobiles are a nuisance. They may serve some people. They don't serve me. I would rather have the money go into transit and, yes, bicycle and pedestrian projects. **[Means]** **II-258** **II-259**

11.6.2 I also want to draw your attention to a statement on page 344 of the EIR, that says: There's been a shift in transit because employment has increased faster than parking supplied, which has improved air quality. This parking garage which is being proposed here to bail out the Port, should not be a part of this project. In fact, it should not be built at all. If the Port needs revenues, tell them to look for maritime or other industrial uses on the waterfront. For example, Muni's new LRVs are being assembled on Port property, and CalTrain cars area assembled on Port property. So there's things that they can look around that would be closer to what the Port is supposed to be. **[Rolfe]** **II-258** **II-259**

11.6.4 In general, this is an extremely disappointing EIS/EIR because it works under several assumptions that are not applicable to San Francisco. They work much better for a suburbanized city, like Fresno, not a compact dense transit-oriented city, like San Francisco. And it also doesn't take into account all the transportation theory that has evolved over the last 15-20 years. In fact, I would argue that this is an irresponsible EIS/EIR. At one point, you make a statement, and I quote. "Enhancement of automobile access would benefit the long-term economic productivity of Downtown San Francisco and adjacent neighborhoods." I think you find a lot of people in San Francisco who will make a very passionate argument that the opposite is true, that enhancement of automobile access will, in fact, have an adverse impact on San Francisco. This is precisely the reason why most Downtowns throughout the nation, except for perhaps Boston, New York, and San Francisco, have completely declined because they have given over their space to freeways and parking lots, and they have enabled urban sprawl. The EIS/EIR completely misses this point. **[Letunic]** **II-261**

11.6.4 I also handed out today a petition that I put out in '93 that points out that the city has, for many years, had plans to convert the waterfront from a working water front to being one specifically for tourism or retail. And, as you have seen in the recent years, we have now killed our port. You have seen the articles in the newspaper that the port people themselves have literally thrown out all the port operators. So what we are tying to do is convert ourselves into a single type of economy. This is going to be a serious flaw because you are going to see because of the information superhighway and other issues that retail sales are going to fall to zero because people are going to be buying their things over a telephone, over a computer from a remote place out in the boondocks and having it shipped to them. And putting San Francisco into the tourism business or the retail trade business is going to be very serious economically. More importantly than that, before that happens - that is going to take a few years, but it is our position that having the city use the earthquake to implement plans that have been done politically since the early Eighties is, at minimum, a government-taking of property and/or a criminal act. We have submitted a formal complaint to the U.S. Attorney documenting the whole issue here, and that the city and its Planning Commission and its Port and the rest of this list that we're going to go through this process, have ignored the material fact and have it done it consistently so. **II-261**

You've already wasted hundreds of millions of dollars, and you have been getting away with it and getting away with it. And the only reason you are going to get caught now is that the river of money from the federal government is going to get cut off, and you can no longer buy what you've been buying. And I, quite frankly - I'm not going to go into all the details I could because I am going to put most of this in writing because I have to if we're going to go to court. But I just wanted to come and let you know I haven't given up after ten years, and I am just saying that I know that there are a bunch of crooks running San Francisco. I know you are going to kill the northeast quadrant to support the Mission Bay project. And I know that the plan to kill the Transbay Terminal is so that the plans to develop high rises in the Transbay Terminal area has long been in place, and I hope to see some of you folks, Willie Brown, Mr. Jordan, Feinstein, the Planning Commission, the senior staff who have to have only lied to the public in their document, I hope to see you serve time. **[Queen]**

9.7 Comments Regarding General Organization of the Document, Graphics, Factual Information Provided, and the Review Process

11.7.1A First of all, this is an EIR for transportation project. No two ways about it. And it doesn't have an index that anyone trying to understand the transportation impact can understand. I did my own table of contents, which I will give to the members of the public that are trying to struggle their way through it. But any EIR that has a table of contents that has a page jump of 120 pages on transportation, with no indication of where to find information on transit; where to find information on traffic; where to find information on all of the subcategories of traffic - is a document that wants to hide information; it is a document that people are so caught up in the minutia of drafting, that they've forgotten this is a public document. The Department should have a rule: Any chapter that goes beyond a certain number of pages you have to sub-head. 120 pages is over any threshold. My index, which - I mean, I want the staff to have - I'm not going to give it to the staff; let them do the same thing I had to do. They've been working on it so long, they know the structure. They don't need this, but the public does. And I consider it insulting to the max, on the transportation document, to not have a pathmark on how to read this. And I'm sure any Commissioner that has tried to read this prior to this hearing had the same problem. **[Hestor]** **II-262**

11.7.1C Finally, one suggestion about dealing with the alternatives here. The packaging makes it rather cumbersome. People should be able to comment on each major element independently, the Mid-Embarcadero, Fremont ramp, Second Street ramps, and any others without having to package them into groups. It would make it much simpler. They aren't really that connected. **[Alexander]** **II-262**

11.7.1C I am from SPUR, San Francisco Planning and Research Association. My first substantive comment is that I believe that the document is very difficult and confusing to use. Amongst the reasons for that is the bundling of components of the alternatives - opening or not of Davis Street, urban design alternatives in front of the Ferry Building, and then the myriad of alternatives on the freeway ramps. I don't see any reason why these need to be bundled, and I think the decision-makers should be able to mix and match components, and would ask that those be unbundled. **[Chappell]** **II-262**

11.7.1C So I'm basically going to speak on the Mid-Embarcadero Roadway and Terminal Separator ramps as two separate projects. The entire report identifies two basic impacts: traffic congestion, of course, there's going to be more traffic congestion, and the other archaeological resources. Many speakers last night stated that additional ramp capacity leads to additional traffic congestion. And this is obvious, and there seems to be a lot of support out there for less ramps. So I think that should be taken separately from the issue of the Mid-Embarcadero Roadway. **II-262**

I'm a San Francisco architect with 26 years experience in engineering and urban planning. My firm of DeMars & Maletic had been involved with the public process probably since the inception of the Citizens Advisory Group on the Embarcadero four years ago, and with similar projects over the past 40 years. It is obvious this project breaks down into two projects: the Mid-Embarcadero and the freeway ramps, 92-202 and 94-060. As everyone knows here, "92" refers to September '92, when the Embarcadero project first began. It was then referred to as "Replacement of the Embarcadero Freeway." The Planning Department and consultants began at that point. But then in January '94, the Terminal Separator was added. Why it has taken three years to conduct the study is not commonly understood by the public. Why it has taken so long? The answer is because it is actually two EIRs. One of the previous speakers has mentioned unbundling the alternatives, and I agree with that. By the time the roadway was combined with the Terminal Separator - the duration of the study grew from 18 months to 36 months. This is the reason we do not see a project completed in front of the Ferry Building today.

My suggestion for the EIR/EIS vote that is coming up in the Commission is that the Commissioners split the vote and vote twice: once on the freeway ramp alternatives and once on the Mid-Embarcadero Roadway alternatives. **[Maletic]**

11.7.2 Just specifically commenting on what I have seen in the EIR/EIS regarding photographs. I am not asking for lots of photographs just to make his book spicier, but I was somewhat disappointed that there weren't more photos. Specifically, on Page 237, the photos of directly in front of the Ferry Building showing the proposed appearance of the Alternatives 1 through 4 and then at the bottom Alternative 5, and you do see quite a difference there in the appearance of the plaza, but I wish these photos could be photomontages, I guess you would call them, could be refined to show a little more clearly the nature of the two plazas and how the roadways would go. And also I was kind of wondering why the *trees* were eliminated from the lower picture of Alternative 5, but the upper picture still shows all the trees that are there today. And I don't want to start a debate on trees here, but this is something that was discussed at the meeting of the Citizens Advisory Committee. I thought the idea is to tie Market Street in with the Ferry Building finally now that the Embarcadero Freeway is gone, and that would mean getting rid of those trees and other barriers to what used to be Market Street going through to the Embarcadero. So this top picture would be a lot clearer if those trees were eliminated from it, as I hope they would be and not because I'm not a tree lover, but again trees don't belong everywhere. They shielded the freeway when it was there. It's no longer there, so those ought to go, and then we'll have that grand view towards the Ferry Building. I am not saying to cut the street through. I'm not favoring automobile traffic through there. I think it would be nice if there was still some way to get the F line straight through the center to the plaza, but I don't know if that's possible. That's one of the options mentioned here in Alternative 5. Anyway, I wish these pictures could be refined and possibly have a few more photos showing clearly the nature of the different alternatives. You know, the old cliché about a picture being worth a thousand words. I think it could be here. **[Levin]** **II-264** **II-265**

11.7.2 Second of all, generically, one of the big issues around the alternatives and around circulation is which way traffic flows in this city. And you look at the base documents, all these base maps. I've just picked one up. Page 57. It's not any particular one. It's just I've got my page open to it. It would help to have which ways do the traffic go marked on all of the maps. It would help to have maps that have those imbecilic, but helpful, documents that have those scattered arrows depending on how much traffic flows, so you have some idea what the traffic flow was. **[Hestor]** **II-264**

11.7.3 As a starting point, I would like to point out a factual error in the Draft EIR. On Page 362 of the report, Line 5 of the first full paragraph, there is a notation that, "Stillman has one eastbound travel lane." Anyone that has visited this location will note that Stillman is a frequently used two- **II-266** way street running both eastbound and westbound. And this is highlighted by a picture on Page 233 of the report that shows cars parked in both directions. The reason I start here with this error is that in recognizing that the EIR was a very large and probably difficult effort to coordinate, comments made throughout the report would seem to indicate that the authors did not spend enough time at the site to observe potential impact of both proposed off ramp on to Second Street as well as the new on ramp on to Harrison. **[Gott]**

11.7.4 I can't remember if I've ever seen eight commissions and the Board of Supervisors in a three-week period starting from scratch on making a determination that has serious consequences. Here we are reading an EIR that is a mammoth EIR, hard to understand, complicated, poorly indexed. And we show up at a hearing and find out that you're already at the end process, which is which of these do we go for, before you even finish the comments. I understand that you have to figure out which is the one you put in more effort on the final EIR, but you don't do it while the public hearings are still going on the EIR. You don't do it while there is still public comment. You're telling us we are irrelevant. You are telling us that the insiders in the Department that have gone through these meetings - Redevelopment, Parking and Traffic, the Port, Public Transportation, the Planning Department - made the decision because our input is irrelevant, because we can't give you meaningful input. I'm still reading the EIR. I don't know what my recommendation is. I know I have some problems with what's in the EIR. And you plan on jamming this before the Board of Supervisors on an October l9th hearing on land use and a vote on the 23rd. The Redevelopment Commission calendar, which I got today - now I understand why they're starting their meeting at two o'clock, because it was going to be too embarrassing to have three four o'clock hearings next Tuesday. Redevelopment, Parking and Traffic and Rec. Park all meet at four o'clock on Tuesday, and you would have had to have your staff at three places instead of two places at once. So Redevelopment moved their calendar to two o'clock, which would weird out all the people who cleared up their calendars for four o'clock - Redevelopment. If you go forward today, you are telling us that this process is not a public process; it is a staff process. **[Hestor]** **II-267**

11.7.4 And we have been very concerned about this schedule that we just got today telling us how they're going to be jamming all these meetings together from September - from today on to October 16th, which was when we thought that the public comments were due. You've got eight commissions meeting, and they would not have heard many of the public comments. How are they supposed to be making their decisions without having heard these public comments on the documents themselves? Not necessarily what we've talked about all these years. We're **II-267** talking about this document and how it is to be used as a document that the City will be using to work - to rebuild the transit, the transportation and traffic system into the northeast sector of the city. So - and now I understand that it's been pushed back even - or been pushed forward - pushed back, actually, even further to the 23rd of October, which is when it's supposed to go to the Board of Supervisors. It's just ludicrous that we, the public, will not have that opportunity to have our voices heard on this particular EIR. I think that delaying - you know, four years we've been at it. Why are we doing it all in two, three weeks period? And I really think that that has to be a consideration in your decision today, whether or not you will be given a because your opinions are going to be looked upon by all these other agencies, also. **[Lim]**

11.7.4 And I also want to join in the comments about the timing of this thing here. I mean, on the 23rd the Board of Supervisors is supposed to make its decision. All the other commissions are supposed to have met by then and make their decision. The closing period for comments is also the 23rd. I suggest everybody should put that off. **[Rolfe]** **II-267**

11.7.4 I was the co-chair of the citizens committee which succeeded in advocating the demolition of the Embarcadero Freeway. In a few weeks, six years will have passed since the earthquake occurred, and during that time we have seen it all. We have discussed underground roadways, discussed above-ground roadways, discussed split roadways, parallel roadways, and every other kind of roadway possible. We've had consultants who have spent an enormous amounts of money studying this. The material that you have in front of you is the long-awaited product of a great deal of that work, and it is time that you make decisions. But the decisions that you make today are not the final decisions. This is just an important benchmark on the road to finally getting something done. **II-267**

This is, as I said, a time for decisions. And this preferred alternative will go back into the environmental process and be out in either March or April with the comments that are being made, and there will be additional time for the development of mitigation measures and other concerns. But without a preferred alternative, nothing can happen. When the EIR was put together, there were a number of scoping meetings; there was a citizens advisory committee of sort of an open-ended nature that has a mailing list of some 3,000 people. More than 150 people have come to many of those meetings and participated in the scoping. Mr. Friese, who is here today, will talk more about that process because he was chairman of that section of the work. And so I urge you to make a preferred alternative, turn this back over to the EIR consultants, and move forward on this. **[Haas]**

11.7.4 I'm speaking in my capacity as chairman of the Citizens Advisory Committee on the Embarcadero project, which is the committee that's the successor to the prior committee, which had made recommendations before the freeway came down. I'm also specifically not speaking in my capacity as president of the Board of San Francisco Beautiful, because we have not taken any formal position, which is why I checked the "neutral" box. I would like you to know, however, that for approximately the past five years, there has been a body meeting with some regularity until approximately a year ago. When I agreed to chair this body, it was with the clear understanding we would be there not only for the creation and publication of the initial recommendations, which we have done and exists in a rather nicely-bound body of recommendations, some of which have been listened to, some of which probably have not, but we made clear that we would not as a citizens committee, despite the unwieldiness of mailing 3,000, merely be a body of space to be ignored in the later process. In other words, we would not use our body, our citizens body, as a legitimizer for allowing the staff to do exactly what has been suggested is being done. I don't believe that's being, done by the way. I think there's been a real serious effort by extremely dedicated members of the agencies of the City over the years to take in citizen input, including citizens groups from Chinatown, which I personally have a great concern for and sat some years ago, to show how far back it goes, at the Fang Restaurant in the presence of people all the way from the Chinatown Six companies to Eddy Liu, with whom you spoke at great length and well into the evening. So I think there has been sensitivity and continues to be sensitivity towards those interests. **II-267**

My concerns, and the reason I'm neutral rather than in support of anything or against anything, are that this is a bit rushed to come to a conclusion as to any specific alternative. I don't think, however, that the fact that it has been rushed should prevent this board from going forward. I think there has been a body of data which has emerged in a preference, at least in a MIOS (phonetically) subcommittee, which Mr. Bob Mannus spoke of yesterday, I believe, in favor of a certain curved roadway, variations of which you've seen here tonight. The economic components, unfortunately, have become the tail wagging the dog in some ways. And irrespective of what one thinks of the public transit or parking or placement of the F-line, the reality is, I think, that certain of these alternatives cannot be achieved, we are told, without the input of money from sources that we cannot now identify.

There is immense opposition to major development of 203 and 202, which are the few blocks along the Clay-Washington corridor, and that evaluation continues actively despite the fact we have not had a meeting of the full committee in a great length of time, frankly, waiting for this very document.

So what I'm saying, it won support for the tremendous efforts and dedication of the various agencies involved, including Planning, CAO, Waterfront, Muni. I hesitate to mention others because I'll leave somebody out. I am concerned, however, over the fact the fact there is as much concern as there is. And what one of them is there has been a lot of efforts made by people who aren't here tonight which result in some of the recommendations which you see before you, but will continue to be here. I'm hopeful that you will, however, move forward quickly as a body, taking into account what has been done by the citizens committee as well as others, including the agencies involved. **[Friese]**

11.7.4 I would like to add at this point just to the - to the EIR presentation here, that I hope it improves in the rest of the commissions. Also, I want to add my complaint to the fact that there are so many commission meetings grouped up in the next ten days that you couldn't possibly attend all the commissions because they're at precisely the same time. If you have some influence in that, I hope you talk to other commissions. **[Maletic]** **II-267**

11.7.4 I'm a member of - I've been a member of the Citizens Advisory Committee, chaired by Robert Friese here, since 1991, and have taken a tremendous interest in this. But I have a difficult time, myself, deciding which alternative at this time that I would prefer, and I wouldn't want to have to make that decision now. I want to have more time to look at the EIR and possibly submit some written comments. **II-267**

So those are just my thoughts at this time, and I leave it in your hands and the other agencies. And, again, I agree that I think too many hearings are being held in the month of October. I wish we could have a little more time. **[Levin]**

9.8 Preferences Expressed Regarding Alternatives

11.8 My husband and I are residents of the Clock Tower building, an unreinforced masonry warehouse which previously housed the Venerable Schmidt Lithograph Company whose designers and printers produced classic California fruit crate labels. The Clock Tower was built in the early part of the century and is located at the corner of Second and Bryant Streets, South of Market. We strongly oppose Alternatives 3 and 5 of the Draft EIS. These alternatives, **II-268** especially with the Second Street option, do not fulfill a major purpose of the terminal separator structure. That is, Alternatives 3 and 5 do not minimize physical intrusions into residential or in commercial areas. As it stands now, my husband and I have trouble crossing the street to go to and from work during peak traffic hours, and it's even more troublesome to enter and exit our garage on Second Street. The current on ramps to the Oakland Bay Bridge have created a safety and health hazard in and around our neighborhood. We do not need any new structures nearby to aggravate an already troublesome living situation. On the other hand, we strongly support the Department of Parking and Traffic proposal, otherwise known as the "DPT variant." The DPT variant not only appears to provide a comparable level of service to other alternatives, but it also reserves improvements to the Essex Street ramp for possible future development, depending on analysis of congestion levels. This conservative approach would have less impact on the human environment and reserves judgment on incurring the expenditure of more public funds than necessary. **[Goodenough]**

11.8 I, too, am a resident of the Clock Tower lofts located at Second and Bryant. As noted on Page 200 of the EIR, Clock Tower Lofts was rated B in the Heritage survey, and it is a contributory building to the South End Historic District, as designated by the Landmarks Preservation Advisory Board. I'm here today to express strong opposition to the two alternatives proposed for the terminal separator structure. The two options I oppose are Alternatives 3 and 5 with special objections to the Second Street option on both of those alternatives. I also do support the alternative described as the "DPT variant. **[Gott]** **II-268**

11.8 When you look at the traffic impacts, how fast traffic moves, the number of intersections tied up, and so forth, a funny thing happens. Alternative 2, which is next to do nothing alternative, works out to be the best. In other words, finish the Embarcadero Roadway, but don't do anything for freeway ramps or anything else. Kind of odd, isn't it? Sort of an example of some of the things that people have been saying in fighting freeways, if you provide more capacity on the freeway, bam, you get more traffic. You don't provide it, you don't get the traffic. Alternative 4 might be the next best because I suppose we could live with the Fremont Street thing. It doesn't seem to cause any interference with the Muni or with other public transportation agencies. I don't want to be just for the Muni. I suppose there is a remote possibility of being able to live with 3C since, as I remarked before, the back ups there occur on the freeway. And this comes back to the problem of money. It says that money will not be available if two or four is chosen. Well, hey, maybe we ought to go to one and do nothing. I understand that the money is there to build the F one, and that is really the most important part of this whole picture anyway. So we would have **II-268** it sitting there. Eventually, they will find the money to build the roadway and to do it right, which perhaps might be the best course to follow, unless we can figure out a way to change the rules or get the money some other way. **[Rolfe]**

11.8 I urge you to revisit the whole thing. Go with Alternative 2. Don't increase ramp capacity. Make people take transit to San Francisco. That is why San Francisco is such a beautiful place. **[Letunic]** **II-268**

11.8 I live in Hills Plaza at the corner of Spear and Folsom, and I'm a member of the homeowners board there and representing the board here this afternoon. I would urge you to accept either Alternative 1 or 2 for the simple reason that those alternatives have the least impact upon the residents of the area. **[Bement]** **II-268**

11.8 I'm secretary of Bicycle Mass. We're bicycle advocates here in San Francisco. I would like to say No. 5 is the worst. Next worst is No. 3. The next worst after that is four, then zero, then No. 2 there. None of these include Class 2 bike lanes. **[Poschman]** **II-268**

11.8 I'm speaking on behalf of a couple of organizations, and I just wanted to articulate those concerns. I was Vice Chair of the Mid-Embarcadero Open Space Subcommittee which considered the alignment in front of the Ferry Building, and what I would like to just do is to articulate that group reviewed that, and we are in support of the paired alignment, which actually is Alternatives 2 through 4 for that area. The organizations represented, which the city has a list of, are the AIA, SPUR, SFT, the Chamber of Commerce, and a lot of other neighborhood organizations. **[Manus]** **II-268**

11.8 The other thing is that when I selected San Francisco - I am from Florida, and I purposely moved here because it's one of the cities that you don't have to be in a car. And when I go visit my parents, we drive for hours and hours, and there's one strip mall after the other. And it's huge super highways destroying the environment, and it's really obnoxious to have to be driving all the time. Our city is compact enough that if we could get a handle on getting people out of their cars, then the environment will improve dramatically. I also wanted to say I just visited Atlanta, and they are going to have the Olympics next year, and you should watch that because they are going to be in a nightmare of a problem because the city cannot handle extra traffic, just like we can't. So I will be writing. I haven't read the EIR yet, but I will write a response to that by the deadline, and, hopefully, definitely not Alternative 3 and 5 with that Second Street off **II-268** ramp. That would be ridiculous. If we're just doing that to get the money, since the 1960s, San Francisco has rejected federal money for super highways, and, hopefully, that's the way we will continue to go for the next century. **[Bird]**

11.8 I also served, and have for many years, on the Rincon South Beach Citizens Advisory Committee. Our committee represents the property owners and residents of the greater South Beach area. That committee has voted unanimously in favor of Alternative 3-B. I also personally believe that that is the most sensible alternative. It provides for a plaza in front of the Ferry Building, and the rampage that's required for 101 is of a limited nature. And I think that it does the traffic situation well. **II-268**

And as I said, I think 3-B is the most appropriate and best alternative, and is the one that seems to have the preponderance of the informed opinion behind it, and it is now time to make a decision. **[Haas]**

10. COMMENT LETTERS

10.1 Comment Letters from Public Agencies

The Draft EIS/EIR was published and distributed on August 25, 1995; it was received by the Governor's Office of Planning and Research ("State Clearing House") on August 28, 1995, and a notice of availability was published in the Federal Register on September 8, 1995. Thus, the public comment period, which was required to be 45 days from receipt by the State Clearing House and 45 days from publication in the Federal Register, extended from August 25, 1995 to the close of business on October 23, 1995.

During this comment period, letters on the Draft EIS/EIR were received from the following public agencies: the US Environmental Protection Agency, Region IX; the California State Lands Commission; the Peninsula Corridor Joint Powers Board; the City of Alameda; the Golden Gate Bridge, Highway and Transportation District; the Port of San Francisco; the San Francisco Municipal Railway; the San Francisco County Transportation Authority; and the San Francisco Redevelopment Agency. A subsequent letter was received from the US Department of the Interior, Office of Environmental Policy and Compliance.

The letters from these agencies are reproduced on the pages which follow. Marginal notes refer to the location of responses to the comments. Responses are contained in Section 11, Responses to Oral and Written Comments.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

City & County of S.F.
Dept. of City Planning
OCT 24 1995

OFFICE OF ENVIRONMENTAL REVIEW
RECEIVED
24 1995

October 23, 1995

John R. Schultz, Chief, District Operations
Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814

Dear Mr. Schultz:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure**, San Francisco County, California. Our comments are provided pursuant to Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR Parts 1500-1508).

The Federal Highway Administration (FHWA) along with the California Department of Transportation (Caltrans) proposed six alternatives to replace the terminal Separator structure and the Embarcadero Freeway since their removal after the Loma Prieta earthquake, five build alternatives and the "No Action" Alternative. The build alternatives ranged in scope from improvements to only the Embarcadero roadway and associated intersections and feeder streets (alternative 2), to improvements to the Embarcadero roadway and the addition of new or realigned peninsula access ramps at Fremont, Second, and Fourth streets (alternatives 3, 4, and 5). Common street and operational improvements, such as lane restriping and intersection changes, were discussed with each build alternative. A preferred alternative was not identified in the DEIS. We recommend that FHWA identify the preferred alternative in the Final EIS.

Based upon our review of the DEIS, we have rated the DEIS as **Category EC-2, Environmental Concerns - Insufficient Information** (please refer to attachment #1, "Summary of Rating Definitions and Follow-Up Action"). Our rating is primarily
based on our concerns regarding cumulative impacts, impacts from II-255
11.5.9B excavation and erosion and runoff, particularly of soils
containing hazardous materials, and compliance with the Coastal Zone Management Act.

We are very concerned that the project proponents did not include a complete analysis of the cumulative impacts on air, land use, erosion and urban runoff. We recommend that the Final Environmental Impact Statement (FEIS) discuss the impacts of the proposed project in a manner which analyzes the project's impacts

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on the environment, along with the impacts from other past, present, and reasonably foreseeable projects (40 CFR 1508.7).

We appreciate the opportunity to comment on the DEIS. Please send us two copies of the Final Environmental Impact Statement (FEIS) at the same time it is officially filed with the U.S. EPA's Washington, D.C. office. If you have any questions, please feel free to call me or have your staff call David J. Carlson of my staff at 415-744-1577.

Sincerely,

David Farrel, Chief
Office of Federal Activities

Enclosures:

cc: Jeffrey R. Brooks, FHWA, San Francisco
Dan Harris, FHWA, San Francisco
Barbara W. Sahm, S.F. Planning Department
Herbert N. Okubo, Caltrans, Oakland

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

GENERAL COMMENT

Cumulative Impacts

We appreciate the inclusion of a listing of other related
and reasonably foreseeable projects, however we are concerned
that the cumulative impacts of these projects and the indirect
effects of the proposed action are not fully analyzed in the DEIS
as required by 40 CFR 1502.16(b), and 40 CFR 1507. We recommend
that FHWA address all of the cumulative and indirect impacts from
spatially and temporally related projects, including potential
impacts that may be out of the direct control of FHWA. The
analysis of the cumulative impacts would include impacts from
such projects as the "F" line streetcar that would run down the
11.5.9 middle of the Embarcadero, the MUNI turn-around at Harrison
11.5.3 C street, and the proposed parking garage in assessor block 202 as II-255
well as the development of land parcels formerly held by Caltrans II-241
that will be turned over to the city. These projects are either
currently underway or are planned to be implemented in the near
future and will have impacts on air quality, erosion, urban
runoff, and hazardous materials in excavated soils.

For example, the proposed parking garage at assessor block
202, which is proposed as a economic mitigation measure, may have
significant impacts, particularly to air quality, traffic and
transportation, as well as erosion, runoff, and construction
impacts. The DEIS does not discuss any of the impacts from the
development of this facility, yet it will clearly have an impact
on the traffic circulation in the area. A structure of that
magnitude could have an impact on the air quality at the
intersection of Washington and Drumm and Washington and the II-241
Embarcadero. Any urban runoff impacts from the garage on the
11.5.5 sewage system or the bay should also be included in the section II-247
on cumulative impacts.

WATER RESOURCES

National Pollution Discharge Elimination System (NPDES)

The DEIS states that the net increase in nonpoint source
pollution would be negligible from any of the alternatives.
However, the criteria for making this conclusion are not offered.
As previously indicated, we are concerned with the potential
cumulative effects on the Bay from urban runoff, including that
11.5.5 which would be generated by the roadway and all associated II-248
projects such as the "F" line streetcar and MUNI. We recommend
that FHWA and Caltrans discuss the capacity of the stormwater
conveyance facility along the Embarcadero and it's ability to
handle additional pollutant loads.

In January, 1993, EPA and the National Oceanic and Atmospheric Administration jointly announced the availability of the Guidance for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters (Guidance) pursuant to Section 6217(g) of the Coastal Zone Reauthorization Amendments of 1990. We recommend FHWA and Caltrans consider this Guidance for the Embarcadero Freeway Corridor project. These guidelines should be referenced in the discussion of mitigation of the construction impacts, as well as the discussion of implementing the guidelines along the roadway, parking lots, and associated facilities when construction is completed.

Section 6217(g)(5) defines management measures as, "economically achievable measures for the control of the addition of pollutants from existing and new categories and classes of nonpoint sources of pollution, which reflect the greatest degree of pollutant reduction achievable through the application of best available nonpoint pollution control practices, technologies, processes, siting criteria, operating methods, or other alternatives."

The DEIS states that there will be erosion impacts from project development and project related land disturbances along the corridor. These activities described in the DEIS could trigger the NPDES permitting requirements. According to the requirements in 40 CFR section 122.26 (b)(14)(x), the actions described in the DEIS are subject to the General NPDES permit for Discharge of Storm water runoff associated with construction activities, California permit #CAS000002. If a permit will be necessary, FHWA should contact the State Water Resources Control Board (SWRCB) at 901 "P" Street, P.O. Box 100, Sacramento, CA, to obtain a copy of the permit and the Notice of Intent (NOI). FHWA should complete and file the NOI and must develop and implement a Storm water pollution prevention plan containing Best Management Practices (BMPs) prior to commencing any construction. We recommend that FHWA and Caltrans describe such BMPs and commit implementing them in the Record of Decision (ROD). **II-249**

Coastal Zone Management

The DEIS did not indicate if FHWA has consulted with the California Coastal Commission regarding the development of the Embarcadero freeway.

11.2

The Coastal Zone Management Act (CZMA), requires that Federal Agencies be consistent with the policies of state coastal zone management programs when conducting activities which affect a coastal zone. The Federal Agency must review the state Coastal Zone Management Plan (CZMP) to determine whether the activity would be consistent with the Plan and then notify the State of **II-190** its determination. Federal agencies must prepare a written consistency determination which includes: a detailed description of the action, its associative facilities, and coastal zone effects; a brief statement on how the activity would be consistent with the state CZMP, and data to support the consistency determination.

We encourage FHWA to contact the California Coastal Commission and the Bay Conservation and Development Commission (BCDC), to discuss the plans for the freeway. The FEIS should contain a discussion concerning the applicability of the CZMA and the State CZMP to the proposed development activities.

HAZARDOUS WASTE

The DEIS states that hazardous materials in the soils have been discovered in the project area, and that those materials will either be treated onsite or sent offsite for treatment and disposal. We are concerned with the amount of material to be excavated and the levels of contamination that were found in samples in the area. The DEIS states that hazardous material was not encountered in all of the sampled sections, however the document does discuss that the number of samples taken in an area may not be representative of the soil conditions of that area.

FHWA and Caltrans identify in the DEIS that the provisions of the Resource Conservation and Recovery Act (RCRA) and
11.5.5 associated state hazardous waste disposal requirements apply to this project, however the document does not disclose how FHWA and II-247
Caltrans propose to handle and treat the hazardous material. We recommend that the FEIS describe in detail the procedures that FHWA will follow in order to meet the requirements. The FEIS should discuss; 1) that Caltrans or their contractor will become a hazardous waste generator upon extraction of the soils, 2) that a generator Identification number must be obtained in order to transport hazardous materials, 3) the methods that will be used to treat the material on-site, and 4) the procedures that will be used to comply with the land ban requirements for handling and disposing of hazardous waste. The FEIS should also disclose that Caltrans or the contractor have met all of the provisions of the OSHA regulations regarding health and safety and handling of hazardous waste. We also recommend that the FEIS discuss how FHWA will determine which soils will be handled as hazardous waste and which soils will be handled as non-hazardous waste and if there will be further soils sampling as the project progresses.

11.5.3 B On page 411 the DEIS states that there could be airborne II-241
concentrations of the hazardous materials found in the soils and that if control measures are followed FHWA expects that the

airborne toxics concentration levels will fall below CAPCOA Reference Exposure Limits. We recommend that FHWA and Caltrans disclose these control measures as commitments in the Record of Decision (ROD). We would also recommend that FHWA and Caltrans implement a community outreach program to notify nearby affected businesses and residences, particularly in the southern portion of the project area, of the construction activities potential to release airborne toxics and the measures that will be employed to reduce the risk.

ENVIRONMENTAL JUSTICE

11.5.7 In keeping with Executive Order 12898, **Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations** (EO 12898), the FEIS should describe the measures taken by the Caltrans and FHWA to fully analyze the environmental effects of the proposed Federal action on minority communities and low income populations. The intent and requirements of EO 12898 are clearly illustrated in the President's February 11, 1994, Memorandum for the Heads of all Departments and Agencies, attached. We recommend that Caltrans and FHWA work closely with the residents and businesses of the immediate area of the freeway. FHWA and Caltrans should also ensure that the residents in the immediate neighborhoods have access to all public information relating to the planning and construction of the Freeway. II-253 II-254

POLLUTION PREVENTION

11.5.8 Pursuant to Public Law 010-508, Pollution Prevention Act of 1990 (PPA), "It is the policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible, and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner." The FEIS should describe how FHWA and Caltrans will implement programs and practices to insure that the project will comply with the PPA. II-254

United States Department of the Interior

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CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Mr. Fred J. Hempel
Division Administrator
Federal Highway Administration
980 9th Street, Suite 400
Sacramento, California 95814-2724

Dear Mr. Hempel:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental/Section 4(f) Evaluation for Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure (Formerly State Route 480) San Francisco, San Francisco County, California.

We concur that there is no feasible and prudent alternative to the proposed project. We also concur with the proposed measures to minimize harm to Section 4(f) resources.

Park and Recreation Resources

We recommend continued cooperation and coordination with the City of San
Francisco and County of San Francisco park authorities in order to reach an II-257
11.5.10 agreement on mitigation measures to park and recreational resources, which may
be impacted by the proposed project. Evidence to that effect should be
documented in the Final Section 4(f) Evaluation.

Historic and Archeological Resources

We recommend continued cooperation and coordination with the State Historic
11.5.6 Preservation Officer, in order to complete a Memorandum of Agreement (MOA) that II-251
should include measures to avoid or mitigate impacts to historic and
archeological resources impacted by the proposed project, in compliance with II-252
11.5.10 Section 106 of the National Historic Preservation Act of 1966, as amended. A II-257
signed copy of the MOA should be included in the Final Section 4(f) Evaluation.

Summary Comments

The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation, providing that the mitigation measures discussed above are adequately documented in the Final Section 4(f) Evaluation.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc: Mr. Herbert N. Okubo
California Department of Transportation
Local Streets and Roads
111 Grand Avenue
Oakland, California 94623-0660

Ms. Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA STATE LANDS COMMISSION

GRAY DAVIS, *Lieutenant Governor*
KATHLEEN CONNELL, *Controller*
RUSSELL S. GOULD, *Director of Finance*

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DEPT OF CITY PLANNING

September 27, 1995

File Ref.: SCH92083065

Mr. James T. Burroughs
Projects Coordinator
The Resources Agency
1416 Ninth Street, Room 1311
Sacramento, CA 95814

Attention: Nadel Gayou

Ms. Hillary Gitelman
Planning Department
City & County of San Francisco
1660 Mission Street
San Francisco, CA 94103

Dear Mr. Burroughs and Ms. Gitelman:

Staff of the State Lands Commission (SLC) has reviewed the DEIR/S for the Alternatives to Replacement of Embarcadero Freeway and the Terminal Separator Structure, SCH#92082065. Based upon this review, we offer the following comments.

11.2 By way of general background, upon admission to the Union in 1850, California acquired nearly 4 million acres of sovereign land underlying the State's navigable waterways. Such lands include, but are not limited to, the beds of more than 120 navigable rivers and sloughs, nearly 40 navigable lakes, and the 3 mile wide band of tide and submerged lands adjacent to the coast and offshore islands of the State. These lands are managed by the State Lands Commission (SLC). The SLC holds its sovereign interest in these lands subject to the Public Trust for commerce, navigation, fisheries, open space, and preservation of natural environments, among others. II-191

The proposed project may involve sovereign tidelands and submerged lands granted in trust, by the Legislature, to the City and County of San Francisco pursuant to Chapter 1333, Statutes of 1968, with minerals reserved to the State. The SLC would, therefore, be a Trustee Agency under the California Environmental Quality Act (CEQA). Activities involving granted lands must be consistent with the granting statutes and the above described Public Trust purposes.

For further information regarding the State Lands Commission's jurisdiction, please contact Mary Howe at (916) 574-1839. Thank you for the opportunity to comment on the proposed project. We look forward to receiving a copy of the FEIR.

Sincerely,

MARY GRIGGS
Environmental Services
Division of Environmental Planning and Management

cc: Dwight E. Sanders
Dave Plummer
Mary Howe
OPR

Peninsula Corridor Joint Powers Board
1250 San Carlos Ave., P.O. Box 3006, San Carlos, CA 94070-1306
(415) 508-6269 fax (415) 508-6281

City & County of S.F.
Dept. of City Planing

OCT 11 1995

OFFICE OF
ENVIRONMENTAL REVIEW

October 10, 1995

Ms. Barbara W. Sahm
Environmental Review Office
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: Draft Environmental Impact Statement/Report (DEIS/DEIR)- SCH 92083065 Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure.

Dear Ms. Sahm:

We have reviewed the DEIS/DEIR and offer the following comments:

Section 2.3, Related Projects, Reasonably Foreseeable Future Projects, and Other
Possible Future Projects, should include a discussion of the CalTrain San Francisco Downtown
Extension Project (DTX Project). This project is listed in the MTC 1995 Transportation
11.3.1 Improvement Program. The JPB is in the process of preparing a Draft EIS/EIR, which is II-195
scheduled for public review in June, 1996.

Two "build" alternatives are being evaluated for the DTX Project: extension of CalTrain from its present terminal station at 4th and Townsend to a new terminal at the existing Transbay Terminal site or an underground terminal at Market and Beale Streets.

11.4.6 The DTX Project is projected to increase CalTrain ridership substantially in the year 2010. This II-227
B may have a cumulative effect on pedestrian traffic in the study area covered by the Embarcadero II-228
Freeway and Terminal Separator Structure DEIS/DEIR. In addition, if the two projects were
11.5.9 under construction at the same time, there could be serious cumulative construction impacts II-254
without close cooperation between project sponsors and coordination of the projects.

Thank you for the opportunity to comment on the DEIS/DEIR. If you need additional information on the DTX Project, please call me at 415-508-6338.

Sincerely,

Marie L. Pang

Marie L. Pang
Environmental Manager

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

October 12, 1995

City & County of S.F.
Dept. of City Planing

OCT 16 1995

OFFICE OF
ENVIRONMENTAL REVIEW

Ms. Barbara W. Sahm
Environmental Review Office
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Dear Ms. Sahm:

Re: **Draft EIS/R Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure**

District planning staff has reviewed the referenced document and provides the following comments regarding the project's identified impacts on Golden Gate Transit (GGT) bus and ferry services.

BUS SERVICE IMPACTS

The document clearly identifies likely impacts on traffic,
including transit buses, under the various build and no build
alternatives. In particular, under incident conditions,
11.4.5 significant delay would occur to transit vehicles for all II-221
B alternatives. Peak-period, peak-direction transit-only lanes are
11.4.9 suggested in the document as a means of mitigating traffic
congestion impacts on transit services. However, it is District II-233
C staff's opinion that peak-period, peak-direction transit-only
lanes may not be sufficient to safeguard transit operations.
Significant delay is likely at various times of day when buses
are positioning for peak service. Delays to buses on the
shoulders of the peak periods can result in both peak- and off-peak
transit service disruption and additional operating expense.
The areas around the Transbay Transit Terminal and GGT bus yard
at Main and Folsom streets are particularly vulnerable to freeway
related traffic incidents. District staff requests that this
mitigation measure be expanded to provide 24-hour transit-only
lanes on critical streets (such as Howard, Folsom, First,
Fremont, Battery, and Sansome) for all alternatives.

FERRY SERVICE IMPACTS

The document clearly identifies likely impacts on pedestrian and bus access to the Ferry Building. In particular, it is stated that the feeder bus bays provided in front of the ferry building under the build alternatives are likely to be insufficient.

BOX 9000, PRESIDIO STATION • SAN FRANCISCO, CALIFORNIA 94129-0601 • TELEPHONE 415/921-5858

11.4.5 A District staff considers it to be imperative that at least five bus bays be provided separate from auto parking to accommodate the identified needs of GGT, Muni, and Amtrak. Furthermore, under no circumstances should feeder bus bays be relocated away from the Ferry Building. II-219

Regarding pedestrian access, all alternatives appear to overlook the need to minimize delay crossing the Embarcadero to and from the Ferry Building. In particular, the option to provide a Muni 11.4.6C F line loop in the median of the Embarcadero in front of the Ferry Building would significantly impede the vast majority of ferry passengers who walk to and from the Ferry Building. District staff suggests that the document identify means to speed pedestrian access across the Embarcadero rather than impede travel. II-229

Thank you for the opportunity to comment on this draft environmental document. Please contact Alan R. Zahradnik, Senior Planner, if you have any questions.

Very truly yours,

Jerome M. Kuykendall
Director of Planning
and Policy Analysis

By

Alan R. Zahradnik
Senior Planner

JMK:snm
c: John R. Schultz, FHWA
Carney J. Campion
Wayne T. Diggs
Eric A. Robinson
Alan R. Zahradnik
a:c:\word\tt\embr-eis.105

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OCT 12 1995

OFFICE OF
ENVIRONMENTAL REVIEW

October 10, 1995

Ms. Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

John R. Schultz
Chief, District Operations
Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814-2724

RE: Draft EIR/EIS - Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm and Mr. Schultz:

Thank you for the opportunity to comment on the above document.
Our Transportation Division has reviewed this document and believes
11.4.5 that the project will impact bus travel times from Alameda to San II-221
B Francisco and requests data which supports your conclusion that the
increase in the travel time for AC Transit buses is only 60 to 90
seconds between existing conditions and each of the 2015 scenarios,
and is purely a result of increased traffic. They also request II-218
11.4.4 data to support the statement that although Alternatives 3, 4 and
C 5 would change the alignment of the Fremont off-ramp, the alignment
would not cause queuing from the ramp touch down to back up 1200
feet to the point where AC Transit buses would be adversely
affected.

If you have any questions about these comments, please contact Cheri Sheets, Supervising Civil Engineer, at (510) 748-4510.

Sincerely,

Colette Meunier

Colette Meunier
Planning Director

CM:CE:C:\...\CEQA\EMBARC.LTR

xc: City Manager
City Attorney
Public Works Director
Supervising Civil Engineer

Planning Department

East Wing, Historic Alameda High School
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Brigid Hynes-Cherin
Executive Director

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To Barbara Sahm	From Brigid Hynes-Cher
Co. The Planning Dept	Co. SFCTA
Dept.	Phone #
Fax # 558-6409	Fax #

October 16, 1995

Ms. Barbara Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Review of Draft EIS/EIR for Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm:

We have reviewed the above referenced document and our comments are grouped below into two major areas of concern, funding and mobility impacts. These comments represent a review of this document by the Authority from both a sales tax funding prospective and as the Congestion Management Agency for the City and County.

A. Funding Issues

1. Revenue Loss to the Port

The Port of San Francisco has identified the expected loss of a revenue stream as a result of the proposed removal of parking spaces located in the median of the current roadway. In addition, the Port feels that parking is necessary to attract retail lessees to an upgraded Ferry Terminal. As a result, the Port is requesting compensation through the construction of an underground parking structure estimated to cost $35 million. If this additional capital cost is required, the funding plan for the Mid-Embarcadero Roadway may become infeasible and, at a minimum, would require the re-zoning and sale of a parcel currently zoned as open space. The document should clarify:

11.6.2 (a) the method used to calculate the amount of revenue loss as well as assumptions about the time frame for the revenue stream. II-258

(b) the criteria for deciding on the appropriate compensation for the Port's loss.

(c) the rationale for the replacement parking spaces in light of the City's transit first policy, especially given the availability of existing parking and transit services within walking distance of the project.

2. Capital Cost and Financial Feasibility

The proposed funding plan for the five alternatives would use from $1 million to $5.6 million in Prop B funds. The current Authority Strategic Plan programs $2 million for the construction of the roadway project. Therefore, alternatives 3 (Fourth Street Option) and 4 would require a revision to the Strategic Plan to meet funding requirements at the $5.6 million level. In addition, the funding plan assumes $15 million from the sale of land. While the Authority provided funding for the preparation of an EIR for the potential
11.2 rezoning of excess land in the corridor, that rezoning decision will be made **II-192**
E after the preparation of this EIR. The document should discuss the impact of the following:

(a) the impacts of using available Prop B funds for the capital as opposed to out-year operating and maintenance costs which have no other alternative source but the General Fund.

(b) the impact on financial feasibility of constructing the garage.

B. Mobility Issues:

Even though several downtown and South of Market intersections are analyzed, the DEIS/DEIR makes no direct reference to the impacts of the various alternatives on the performance of the CMP Roadway Network. The project study area includes many arterials on the CMP network which may be affected by the choice of
11.4.3 alternatives. It makes sense to address CMP network impacts now, because of the **II-212**
B combination of local, state and federal funding sources available to defray the cost of more expensive solutions. If deficiencies on the CMP network are not predicted and addressed now, the City will have to identify other funds to fix them later, after the preferred alternative is built. The document should discuss the impacts on the CMP network.

Thank you for the opportunity to review the document. If you have any questions, please contact Ms. Carmen C. Clark at (415) 557-6853.

Sincerely,

Brigid Hynes-Cherin
Executive Director

J:\DPW\EMBREV.LTR

San Francisco
Redevelopment Agency

770 Golden Gate Avenue
San Francisco, CA 94102

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October 6, 1995

110-08195-151

Ms. Barbara Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: 92.202E/94.060: Embarcadero/TSS Draft EIS/EIR

Dear Barbara:

The following are San Francisco Redevelopment Agency comments on the draft environmental document referenced above. We look forward to your responses.

General

- 11.7.1 A&B The goal of both CEQA and NEPA is to provide concise environmental documents, and the EIS/EIR achieves this goal to a large extent by extensively referencing technical background material. Additional paper could be saved in Section 2, Alternatives, if the *Streets and Operational Improvements Common to All Build Alternatives* section was not repeated for each alternative, but stated once at the beginning of the section.; and it is unnecessary to attach the EIS/EIR distribution list which itself is 103 pages in length. II-262

- 11.7.1 A Section 4.5, Transportation, is 119 pages long, making it very hard to review. This section of the EIS/EIR, as well as other long sections, should have more numbered subheadings to help guide the reader to specific information. The Table of Contents should include a list of all numbered subheadings. There should be substantially more cross-references within the EIS/EIR which include page numbers. And finally, the header should be expanded to include the name of the section, or colored section dividers should be provided. This is not a user-friendly EIS/EIR. II-262

- The draft document does not provide enough information on mitigation measures included as part of the project or identified in the report. Each mitigation measure should indicate who would be responsible for its implementation, how its effectiveness will be determined, and what corrective actions will be taken should it not successfully mitigate the impact as intended. The draft document should also discuss the CEQA requirements for mitigation monitoring and reporting, and how this will be carried out for 11.7.1 D the proposed action. This information must be disclosed to the public and to decision-makers during the draft EIS/EIR review period, since it will influence their understanding of the potential impacts of the project and the feasibility of mitigation measures. For example, projects currently under construction, such as the Muni Metro Turnback project, have not fully complied with mitigation measures relating to dust suppression, construction noise mitigation and archaeology, yet the public feels they have no recourse once the project is approved and under construction. II-263

- 11.3 Section 2.3, Related Projects and Future Projects, has omitted, for no apparent reason, the Ferry Building Historic Rehabilitation and Historic Renovation project, which is clearly related. II-194 In addition, on page 300 there is another discussion of possible future projects, provided as part of the transportation impacts discussion. II-195 It would assist the reader if all projects that somehow relate to the proposed project were listed in one place, with an explanation as to their current status and their relationship to the proposed project and to each other. Similarly, the discussion beginning on page 300 addresses potential cumulative issues beyond the scope of the transportation section (e.g., views, wind and shadow). Finally, the proposed extension of the 11.3.1 Peninsula Commute Service (CalTrain) is only mentioned in the discussion of the Transbay Terminal project (p.305), and should be characterized as a separate but related project. II-195

- 11.7.2 Figures 3.3-1, 3.3-2, 3.3-4, 3.3-6, and 3.4-1 should be revised to show the South Beach Small Craft Harbor that was built in the late 1980s as part of the Rincon Point-South Beach Redevelopment Project Area, replacing piers 42, 44 and 46a. II-264

- 11.7.2 Figure 3.1-4 (page 121) and Figure 3.5-1 (page 177) are inconsistent in their depiction of residential locations in the project study area. One or both of these figures should be revised to reflect current housing occurring in the project study area. II-264

- 11.7.3 The southern portion of Justin Herman Plaza is incorrectly referred to as Embarcadero Plaza (South) on page 179 (Table 3.5-1), page 384 (Table 4.7-3), page 387 (Table 4.7-4), and in text on page 389. These references should be corrected. II-266

- 11.7.3 On page 415, the EIS/EIR should mention other open space/park areas subject to Section 295 of the City Planning Code, including Pier 7, Ferry Plaza, and South Park. II-265

Noise

- Sections 3.5 and 4.7 do not define the acronyms dBA, L_{dn}, L_{dn} dBA, L_{eq},
L_{eq}(h), or L_{10}(h), nor the terms A-weighted or average L_{dn}. Therefore, the
lay reader is unable to follow the discussion of potential noise impacts
contained in these sections. Even for readers familiar with these terms, the II-243
11.5.4 lack of definitions makes reviewing the document exceedingly hard. For
B example, what is the correlation between Figure 4.7-1 and Table 4.7-1? The
fact that definitions for two of these acronyms are buried in Appendix G, with
no cross-references in the text, is of little help.

- Page 178 says that "after the Embarcadero Freeway was closed to traffic, noise
levels in the corridor between Folsom Street and Broadway decreased by a
perceptible 3 dBA in most cases..." (emphasis added) Pages 382, 385, and 386
11.5.4 also indicate that a three-decibel increase in noise levels is perceptible. Page
B 19, however, contradicts this statement by saying that "increases and II-243
decreases of less than 3 dBA are not perceptible to humans." This is a key
distinction which must be clarified, since the project would increase noise
levels by one to three decibels in areas which currently have unacceptable
noise levels based on existing noise-sensitive land uses.

- Table 3.5-1 (page 179) should indicate that the Bippity Bop child care center (a
sensitive noise receptor) is located in the Rincon Center. The table should
11.5.4 show that "frequent outdoor use" occurs at receptor locations 10, 14 and 15. II-243
B The table should also direct the reader to Table 4.7-1 on page 381, which
explains what the "FHWA/Caltrans Activity Categories" shown in column 4
are.

- On pages 382-385, the comparison of the proposed project's future noise
impacts relative to those of pre-earthquake conditions (when the elevated
freeway generated high noise levels) is not explained. Common sense would
suggest that the potential noise impacts to residents in the Golden Gateway
11.5.4 Redevelopment Area, for example, would result from an increase in existing
B (1995) noise levels, not some outdated noise level that existed when the II-243
Embarcadero Freeway was extant. The same confusion can be found in the
overall structure of impact analyses throughout the EIS/EIR. Perhaps on
11.7.1 page 115 the EIS/EIR can explain why two baselines are being studied when II-264
only one of them is a truly valid indicator of existing conditions (1995) and
E the other (pre-earthquake) no longer exists.

- The EIS/EIR does not address the important issue of the long-term,
11.5.4 cumulative impacts of construction-related noise. Residents and workers in
C the project area have been subjected to continuous high noise levels for at II-244
least the last five years. The sources of this noise include demolition activities
related to the Embarcadero Freeway and Terminal Separator Structure,
construction of the north and south Embarcadero Roadway, and eight months

of intensive, near-range pile driving associated with the Muni Metro Turnback project. Disruptive construction noise will continue in the project area as a result of the proposed project, the Ferry Terminal project, the Ferry Building project, the Muni F-Line project, the Mid-Embarcadero Open Space project, the Rincon Point Park project, and the GAP headquarters project. Other possible projects, including Tranbay Terminal, CalTrain Extension, Rincon Hill Sports Arena, Blocks 202/203, and Waterfront Land Use Plan projects, would further exacerbate this long-term impact. Most of these projects have included or will include pile driving and vibrating, which is perhaps the most disruptive type of urban construction noise. Compliance with Article 29 of the San Francisco Police Code (Noise Ordinance), cannot be considered to adequately mitigate these impacts, and the EIS/EIR must find that the proposed project would have a cumulative, unavoidable significant construction noise impact.

11.7.3

- The last sentence on page 385 states: "Consistent with existing conditions and the No Build Alternative, noise levels at many locations would exceed Caltrans/FHWA abatement criteria." The use of the word "consistent" makes this sentence very misleading, suggesting that noise levels would be consistent with noise abatement criteria, rather than exceed the criteria. **II-266**

11.5.4
E

- The discussion under Section 4.7.5 (Noise Mitigation) does not adequately respond to the issue raised in paragraph 2 on page 385, which states: "Based on the Land Use Compatibility Guidelines in the San Francisco Master Plan, the projected future noise levels for the planned Rincon Point Park under the No Build Alternative indicate that development of the park should be 'generally discouraged' unless a detailed analysis of noise reduction requirements is made and the needed noise reduction features included in the design." While noise barriers may not be desirable or feasible at the water's edge adjacent to the future park, the analysis still must be conducted. Why would the infeasibility of this mitigation measure not be considered a significant unavoidable impact of the project? **II-245**

Transportation and Parking

Transportation

11.4.3
C

- On page 7, the summary of transportation impacts says that by 2015, the total number of daily person trips produced in or attracted to the project area is projected to increase above existing volumes by approximately 23 percent, with transit trips expected to increase at a faster rate (30 percent) than auto trips (15 percent). How is this summary finding reconciled with statements on pages 382 and 385 which state that "there would not be a substantial difference between the existing traffic condition and the predicted future traffic condition."? **II-215**

- 11.4.5 A Page 329 needs to clarify the meaning of the term "transit vehicle loading." This term can mean (1) the demand-to-capacity ratio of a transit vehicle, or (2) the process of entering a transit vehicle. The first meaning appears to be used on page 332, paragraph 3, while the second meaning appears to be used on page 329, paragraph 2. II-219

- 11.4.5 A&B The last paragraph on page 307 says the build alternatives would not increase average bus delays, nor increase transit loading (meaning No. 1, above), and would therefore not contribute to cumulative impacts in conjunction with a potential arena project at Rincon Hill. The first statement is inconsistent with one found in Section 4.5.2 (Transit), page 319, paragraph 3; the second statement could be misunderstood based on the dual meaning of the term described above. II-220

- 11.4.6 B Figure 4.1-5 on page 229 shows a crosswalk across The Embarcadero midway between Market and Mission Streets; this same crosswalk, however, is not shown as one of the study crosswalks for pedestrians on Figure 4.5-15. This is a concern since the Muni F-Line would appear to cross the southbound lanes of the Embarcadero Roadway at this pedestrian crossing. The potential pedestrian and traffic safety implications of this confluence of travel modes is not discussed in Section 4.4.5 or elsewhere in the EIS/EIR. II-229

- 11.4.3 A Paragraph 3 on page 273 contains the following statement: "It was assumed in the incident analysis that, during congested conditions, all intersections would remain completely clear of queued vehicles. This reflects the situations that occur when parking control officers (PCOs) are assigned to keep the intersection clear and assure that cross-street traffic has the ability to pass through." In lay persons terms, this means that for the worst-case scenario, when an incident on the Bay Bridge causes traffic on local streets to back up into the Financial District, this EIS/EIR assumes that gridlock does not occur anywhere in the South of Market Area or the Financial District. As described below, this is not only an invalid assumption which could subject the EIS/EIR analysis to undue legal challenge, it also causes internal inconsistencies within the EIS/EIR itself. II-210 II-211

- 11.4.3 A Figure 4.5-11 and Figure 4.5-13 respectively show the level of local street congestion that would occur during incident conditions in the year 2015, if no project is implemented and if Alternatives 3, 4 or 5 were implemented. The text describes a situation where vehicle queues would "spillback" as far north as Broadway. To prevent gridlock from occurring on local streets during incident conditions (as assumed in the EIS/EIR analysis), PCOs would have to be dispatched to 37 intersections under Alternative 1, and 40 intersections under Alternatives 3,4 and 5. On page 298 the EIS/EIR indicates that the DPT is "scheduled to receive funding from federal sources to implement a video camera network to enable the dispatch of PCOs to critical locations in case of severe backups on the Bay Bridge." The speculative nature of this II-210 "improvement measure" is inadequate to mitigate the clearly significant impact of gridlock which presently occurs, and which will continue to occur and worsen in the future; it also does not support the underlying assumption.

- More importantly, paragraph 3 on page 278 states that "vehicle saturation on those street would create *backups on other cross-streets* in the downtown area, such as on Bush, Market, Mission and Fremont Street (emphasis added). This contradicts the assumption that no gridlock would occur, and represents a significant inconsistency in the EIS/EIR.

- To present a realistic and conservative analysis of potential traffic problems that will occur in the future, with or without implementation of the proposed project, the analysis in the EIS/EIR should be revised to focus on incident
11.4.3 A conditions, which presently occur approximately 25 percent to 30 percent of the time during the PM peak commute period. Table 3.3-2, which shows only three intersections in the primary study area as currently operating at unacceptable levels of service (LOS E and F) during the AM and PM peak periods, is therefore extremely misleading. Why are existing levels of service during incident conditions not discussed in the Affected Environment section beginning on page 139? Is the percentage of time incident conditions occurs during peak commute periods increasing? What percentage of the PM peak commute period will occur under incident conditions in the year 2015? Will the Bay Bridge Seismic Retrofit project increase the frequency of incident conditions? How will that affect local street traffic and gridlock? **II-210** **II-211**

- Since incident conditions occur 25 to 30 percent of the time during the PM peak commute period and represent a realistic worst-case baseline against which the proposed project should be analyzed, other related topics in the EIS/EIR should also be based on an incident condition baseline analysis. These include, but are not necessarily limited to, transit vehicle delays, inter-modal conflicts and increased risk of accidents, response-time delays for emergency service providers, air quality impacts including CO hot spots, noise, and socioeconomic effects.

Parking

- Paragraph 1 on page 161 states that three agencies "are responsible for managing parking" in the study area. However, in the discussion that follows, four agencies are identified, including the San Francisco Department
11.4.7 A of Parking and Traffic, the Port of San Francisco, the Bay Conservation and Development Commission, and the California Department of Transportation. In addition, some parking is identified as being privately owned and managed. On page 164, Table 3.3-10 only identifies parking controlled by the "City" and the "Port," which is confusing since the Port is an agency of the City and County of San Francisco. These discussions should be revised for clarity and consistency. **II-230**

- 11.4.7 B The EIS/EIR should explain why there are two separate sections in the report addressing loss of parking (Sections 4.5.3 and 4.6.6). In addition, neither of these sections discusses the 76 parking spaces that would be displaced along Harrison Street, described on page 10. II-230

Section 106

- 11.5.6 B The August 8, 1995 letter from Cherilyn Widell, State Historic Preservation Officer, California Office of Historic Preservation (contained in the Comments and Coordination section of the EIS/EIR) indicates that an understanding has been reached concerning the potential eligibility of buildings at 31 Drumm Street and 35 Drumm Street for inclusion in the National Register of Historic Places. Table 3.11-1 on pages 199-200 and the Section 4(f) Evaluation should be revised to reflect this understanding. The letter and table should also be checked for possible transposition errors (i.e., 926 and 946 Harrison Street and 301 and 501 Folsom Street). In addition, the Seaman's Institute building at 240-242 Steuart Street, which is correctly identified in Table 3.11-1, should be deleted from page 457 of the EIS/EIR and pages 40 (Figure 3.9) and 71 of the Section 4(f) Evaluation; the Seaman's Institute building is not considered potentially eligible for inclusion in the National Register, as determined in 1981 through a consultation process involving the San Francisco Redevelopment Agency, the State Historic Preservation Officer, and the Keeper of the National Register. In fact, the entire EIS/EIR, including all technical appendices, should be checked for internal consistency, since we continue to find additional discrepancies. For example, Table 3.11-1 and the Section 4(f) Evaluation are inconsistent in their characterization of the YMCA Building and the Drumm Street buildings relative to the National Register. II-251

- Given the description of the California Register provided on page 201, Table 3.11-1 should be revised to show the following properties as listed therein: 540 First Street; 2 Harrison Street; and the San Francisco-Oakland Bay Bridge.

- The last sentence of the first paragraph on page 456 states that the SHPO concurred with the findings of the HPSR, while her own letter (referenced above) suggests that "disagreements" existed. Clarification should be provided.

- Paragraph 2 on page 456 is inconsistent with Table 3.11-1 in the number of properties identified as being in the National Register, previously determined potentially eligible for the National Register, appearing to be eligible for the National Register, or that are designated local landmarks. In addition, whereas the paragraph in question states that a portion of an historic district within the APE appears eligible for the National Register, it is not shown in Table 3.11-1.

within the APE appears eligible for the National Register, it is not shown in Table 3.11-1.

- The Memorandum of Agreement (MOA) referred to on pages 24 and 462 is referred to as a Memorandum of Understanding (MOU) on page 460. Is there a substantive difference between these two memoranda or are they considered interchangeable for the purposes of the proposed project?

Conclusion

We believe that the EIS/EIR contains extensive analysis, but that there are a number of sections which should be corrected and issues clarified. We hope that our comments assist in its revision and would be happy to discuss these comments with your staff should it be necessary.

Yours very truly,

Thomas G. Conrad
Chief Planner

cc: Mr. Clifford Graves, SFRA
Mr. Michael Kaplan, SFRA
Mr. David Madway, SFRA
Mr. Bill Nakamura, SFRA
Ms. Rebecca Kohlstrand, CAO/WTP
Mr. John Schultz, FHWA

PORT OF SAN FRANCISCO
MEMORANDUM

To: Barbara Sahm, Environmental Review Officer

From: Sharon Lee Polledri, Planning and Development Director

Date: October 23, 1995

RE; **Review of EIR/EIS for Mid-Embarcadero/TSS Replacement Project**

Thank you for the opportunity to comment on the EIR/EIS for the Mid-Embarcadero/TSS Replacement project. The following summarizes the Port's staff comments on the document.

As you may know the Port Commission reviewed the roadway alternatives being evaluated in the EIR/EIS at its October 10th meeting. The Commission endorsed roadway Alternative #3 which included the Department of Parking and Traffic modifications. I am enclosing the staff report and resolution from the Port Commission meeting.

Members of the Port Staff including Dan Hodapp, Paul Osmundson, Joe Wyman have participated over the last 48 months in the development of the project design as well as in the coordination of the EIR/EIS. We have certainly appreciated and respected the hard work of your staff Hillary Gitelman and Paul Maltzer .

The Port's comments are limited to the organization of the "Summary of Major Environmental Impacts and Mitigation's Section" in the Executive Summary, due to the on-going participation by staff in the production and coordination of the technical studies over the many months.

11.2 C Land Use (p.5, last sentence). While not mentioned in the summary section, this small plaza area is under the jurisdiction of the Port of San Francisco and is licensed to the owner of Bayside Plaza for park, plaza and open space uses. Any encroachment into the plaza should be reviewed and approved by both the Port and Bayside Plaza, under the rules of the Uniform Relocation Act. II-191

11.2 D Land Use and Plans/Policies. Land Use section should acknowledge the Embarcadero as part and parcel of Port's property which is imbued with the public trust and the use requirements that go with the trust, established under the Burton Act. The primary function of the Embarcadero (as pointed out in the Port's 1992 memo to Rudith Nonthenburg) is to provide access to the waterfront, with other functions and beneficiaries being secondary. This comment should also be reflected in the Plans and Policies section. II-191 II-192

11.5.1 C Land Use (p.6, second mitigation measure). A portion of the park land on Assessor's Block 202 is within the Port of San Francisco jurisdiction. Any proposed design changes to "assure a finished edge" must be reviewed and approved by the Port. II-236

11.4.9 A Transportation (p.10, last mitigation measure). Measure should be amended to include specific language concerning construction on the Embarcadero. Lanes in both directions should be maintained at all times. The measure should also define "night time hours" (perhaps 10:00 p.m. until 5:00 am). Adequate signage and public outreach should be provided to divert traffic around construction areas at an early and sufficient distance from the construction zone. II-232

11.3.4 Transit (p. 13, first paragraph). While not mentioned specifically in this paragraph, the "expansion of the bus layover lot at Mission and Steuart Streets" should not be described as a given. This expansion area cannot occur without the Port's concurrence. The Port has also embarked on a renovation of the Downtown Ferry Terminal and the Ferry Building as a major intermodal transportation facility, and the expansion area will provide layover facilities for the new projects. II-198

11.4.5 A Transit (p. 14 -15, Mitigation measures concerning loading/unloading at the Ferry Building). Given the impacts of A and B on the proposed pedestrian space in front of the Ferry Building, supplemental loading areas elsewhere (Item C) would be preferable to the overall urban character of the area. The impacts of all three mitigation measures should also be discussed in the visual quality section of the report. The discussion of BCDC policies concerning filling of the Bay should be expanded to include possible BCDC limitations on parking buses in front of the Ferry Building. In other areas of the roadway project, BCDC has prohibited parking in key view corridors. This rationale may also be applied to the Ferry Building. II-219

BCDC's Design Review Board (DRB) has reviewed the mid-Embarcadero project as part of a project review on the Downtown Ferry Terminal (Meeting notes attached). In that discussion, the DRB clearly supported the idea of filling the Bay in support of water transit and providing additional space for ferry passenger access to the landing facilities, contrary to what is indicated by mitigation alternative C.

11.4.9 B Transit (p. 15, first full paragraph). While the mitigation measure may be adequate for buses, there is no mention of ferry riders who will cross the construction area on a daily basis. Adequate crosswalks (both temporary and permanent) should be provided in multiple, convenient locations to the ferry landing facilities to the north and east of the Ferry Building. Adequate signage should be provided (both temporary and permanent) on both sides of the Embarcadero to direct passengers to the ferry landing facilities, and appropriate bus stops. II-233

11.4.6 B Pedestrian and Bicycle Facilities (p.17, first mitigation measure). Why is it necessary to narrow the sidewalk along this stretch of the roadway ? Also, the deletion of trees in this portion of the project would seem detrimental to the residential structures immediately to the west. II-228

11.4.6 B Pedestrian and Bicycle Facilities (p.17, third and fourth mitigation measure). Priority should be given to ferry patrons during peak hours. We would suggest that the signals be modified in such a fashion as to allow one cycle signals in the morning and afternoon peak hours. The project could also provide a program of signs from the base of Market to the ferry departure points to minimize pedestrian confusion over appropriate landing facilities in the immediate area. Temporary signs should also be provided during construction. II-227

11.6.1 Social and Economic Environment (p. 18, first paragraph). The Saturday's Farmers Market is a valuable tenant of the Port of San Francisco. The Port would consider the relocation of the market, off Port property, as a significant loss to the attractiveness of its property. The Market provides a public draw to the waterfront (a goal of the Port's Waterfront Plan). The Market also generates a great deal of activity on Saturdays, a typically less active day for the Port. This activity generator provides additional revenue to the Port by filling vacant parking lots and meters one additional day per week. II-257

The discussion of alternative locations for the Market should also include Pier 1/2, the small parking lot and public access area between the Ferry Building and Pier 1.

11.4.9 B 11.6.2 Social and Economic Environment (p. 18, third paragraph). Is it that there is "no evidence that indirect environmental impacts are associated with parking displacement from time to time", when a substantial number of parking spaces are displaced at one time ? Clearly, the parking spaces which will be deleted serve a number of different uses within and outside the project area. The deletion of the parking spaces will require users of these spaces to find alternative accommodations. Without adequate signage throughout the immediate area to direct patrons to alternate parking supplies, patrons may circle the blocks in an attempt to locate secured parking. II-233 II-258

Last sentence of the paragraph, is this statement true for other land uses within and adjacent to the project area ? Many of the uses on Port property are destination uses -- waterfront restaurants, ferry and excursion departure points, private clubs, public access -- which need a certain amount of parking to support their continued viability. The Port's future plans (renovation of the Ferry Building, construction of the Downtown Ferry Terminal, and implementation of the Waterfront Plan) envision increasing these types of activities in the immediate project area, which justifies a secured parking supply.

11.6.2 Social and Economic Environment (p. 18, last paragraph). This section should also discuss the timing for construction of the garage, should that alternative be selected. It is the Port's understanding that under functional replacement rules II-259 construction of the parking garage must commence at the time the roadway project begins, or already have been completed. There would also be a period of time between the deletion of some or all of the parking spaces and the completion of the parking garage. Will interim facilities be provided by the project until the completion of the garage ?

muni
SAN FRANCISCO MUNICIPAL RAILWAY 949 PRESIDIO AVENUE, SAN FRANCISCO, CALIF 94115 415-673-6864

MEMORANDUM

To: Barbara Sahm, DCP-OER

Through: Kathy Gilbert, Deputy Director for Operations KG

From: Peter Straus, Director of Service Planning

Subject: Comments on Embarcadero Roadway/Terminal Separator DEIS/DEIR - Additional Traffic Mitigation Measures

Date: October 23, 1995

Muni staff has been involved throughout the process of producing the transportation study for the DEIS/DEIR for the Terminal Separator/Embarcadero Roadway project, and the Public Transportation Commission will soon be taking an official position as to the preferred alternative for the Embarcadero Roadway and TSS. As your staff requested, this memo is to provide additional comments on some of the issues we have commented on throughout the process, to provide an update on some of the operational issues and recent developments at Muni in relation to the study area, and to suggest additional mitigation measures to be included in the final report.

Incident Analysis

11.4.3 A One of our consistent comments throughout the traffic study was that the description in the study of the congestion levels and delays for many of the streets that we operate on did not reflect our everyday experience out on the streets. In general, the situation as portrayed by the traffic study was too optimistic, and did not show the extreme delays we have regularly experienced on Bush, Battery, First Street and others since the 1989 earthquake. With the inclusion of the Incident Analysis, this has been corrected. The Incident Analysis does show that, for approximately 1/3 of the time, these streets are backed up for extensive periods due to traffic backups or incidents on the Bay Bridge. This is a significant amount of delay for transit vehicles, and in particular precludes provision of service on a reliable basis. II-211

11.4.3 A We would like to request that the text in the report reflect one additional point, which we have made throughout the study. The report notes that incident conditions affect the operation of city streets 1/3 of the time, creating backups. This does not mean that during the remaining 2/3 of the time that the streets operate in the optimal manner assumed in the report to be the normal condition. In reality, the operating condition of the streets during the remaining 2/3 of the time should be considered as a spectrum of conditions, with the "normal" condition which the report concentrates on as one end of the spectrum, and the incident conditions as the other end. There is not a hard line between when the streets are operating normally and when they are operating under incident conditions, and operations in non-incident conditions can range on the spectrum from optimal to conditions almost as bad as during incident conditions. II-211

Operational Issues

The effects of the inconsistent conditions of frequently experienced delays referred to above have recently forced us to begin looking at changes to several bus routes in an attempt to avoid some of the more congested areas where we experience most of the delays. As a short-term measure, because of the problems we are currently experiencing downtown, we are beginning the process of rerouting

the 15-Third line off of Bush, Battery and First Street. As an example of current conditions, the
southbound 15-line vehicles operating north-of-Market regularly operate near-empty in the PM peak, II-220
11.4.5 B because their progress is so slow that walking is much faster than riding the bus. As an additional
short-term measure, we are also looking at moving the 12 and 42-lines off of Battery, because of the
congestion on that street. We are looking at several alternate routes.

Additional Mitigation Measures

A number of mitigation measures for transit operations were included for all alternatives in the original report. While we feel that some of these could help our operation, we have never felt that adequate attention was given to Muni's needs, and that in any event, the report's proposed mitigations will need to be looked at more closely before proceeding with any of them.

We have recently begun talking to the Department of Parking & Traffic about additional mitigation measures, beyond those already mentioned in the TSS report, as more permanent and far-reaching approaches to solving some of the problems we are experiencing, mainly on Battery, Bush and First Street. The following additional measures have been discussed, and we would like to have them included in the report for possible future study, funding and implementation as part of the TSS project:

1) Construct a boarding island for the 42-Downtown Loop on Battery just north of Market
in the left lane, so that the 42-line could stop on the left side of the street north of
11.4.9 C Market, then operate entirely within the left-side transit lane on First Street. Currently, II-233
the 42-line serves a stop on the right side of First Street, then must merge left across
two lanes of bridge-bound traffic on First Street to get into the left-side transit lane.
This causes delays to the route.

2) Create an all-day, transit-only contra-flow lane on Sansome between Clay and Sutter for the 12, 15 and 42-lines. This would allow us to take these lines off of Battery and Montgomery, which are severely backed-up.

3) Make the First Street on-ramp to the Bay Bridge the HOV lane, allowing general traffic on the Essex and Sterling ramps only.

Please note that these are examples of the topics under discussion, but this is not an exhaustive nor final list of the measures under discussion, and not all are related to the TSS/Mid-Embarcadero project. There also may be other ideas which warrant consideration, including transit-only operation on Market Street, which has been considered before, one-way street reversals, and creation of other transit-only streets.

Additional comments concerning the F-line will be provided in a separate memo. Please call Duncan Watry at 923-6096 if you have any questions.

cc: Hillary Gitelman, DCP-OER
Bond Yee, DPT
Jack Fleck, DPT
P Adams
R Boomer
K Gilbert
N Whelan
P Straus
R Niewiarowski
D Watry (2)
SP Chron

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MUNI

1155 Market Street ▪ San Francisco, Ca 94103 ▪ (415) 554-0785

TO: Barbara Sahm, DCP-OER

FROM: Ron Niewiarowski, Capital Projects

SUBJECT: Comments on Mid-Embarcadero/Terminal Separator Structure DEIS/DEIR

DATE: October 23, 1995

The following are some comments on the above-mentioned subject document:

1. The document should be updated to show the latest endorsed F-Line alignment, which includes the F-Line loop track through and partially around the MUNI Ferry Bus Terminal at Steuart and Mission. In addition, the graphics should show the F-Line accessible stops at the Ferry Bus Terminal (one eastbound stop and one westbound stop) and the latest F-Line stop locations 11.3.5 along lower Markets Street (one westbound stop at nearside Drumm Street and one eastbound stop at nearside Main Street). II-199

2. The description of the F-Line project (on page 92 and elsewhere) should include the F-Line loop track. This loop track is an essential element of the F-Line alignment, in that this loop will afford significant operational benefits to MUNI streetcar service. The benefits include, but are not limited to the following: (1) During events (such as a parade on Market Street), incidents or emergencies, the loop track will serve as a terminal, so that streetcar service can continue either along The Embarcadero to Fisherman's Wharf or along Market Street to the Upper Market area, depending on which track segment is still available for service; (2) In the event a streetcar becomes disabled along the lower Market or Embarcadero segments of the F-Line, this disabled streetcar can be removed from the mainline revenue service tracks and temporarily parked on the loop track within the Ferry Bus Terminal area.

3. All references to and descriptions of the MUNI Bus Layover Lot should be changed to MUNI Ferry Bus Terminal to reflect the true nature of this operating facility. In addition, the description of the Ferry Bus Terminal (on pages 92-93 11.3.4 and elsewhere) should include additional key information, including, but not limited to the following: MUNI needs to expand its Ferry Bus Terminal in order to accommodate MUNI's increasing use of high-capacity and cost-effective, 60' articulated buses and to accommodate long-term expansion of bus transit service to the area, while at the same time and in the same site II-198

accommodating the inclusion of the F-Line mainline tracks and loop track, as well as the emergency ventilation shaft structure for the MUNI Metro Turnback project. The last line of the first paragraph on page 93 should be corrected to reflect that the Ferry Bus Terminal expansion is funded.

If you have any questions, please do not hesitate to call me at 554-0723.

cc: Hillary Gitelman, DCP-OER
P. Adams
R. Boomer
N. Whelan
K. Gilbert
P. Straus
D. Watry
F-Line Embarcadero file
Chron file

F&FBT20.RN

10.2 Comment Letters from Private Individuals and Groups

During the public comment period on the Draft EIS/EIR, comment letters were received from the following private individuals and organizations: the Sierra Club; San Francisco Tomorrow; the San Francisco Planning and Urban Research Association; M. Levine; C. Maletic of DeMars & Maletic; W. Schmalz; the Steuart Street Association; the Golden Gateway Center; Lillick & Charles; E. Walters of Citizens for Open Space and to Retain the Vaillancourt Fountain; G. Chester; the Clocktower Lofts Owner's Association Board of Directors; A. Meader; Design in Sync; L. Bird; D. Gordon; A. Rogers; M. Paglietti; S. Caramia; the South of Market Alliance for the Revival of the SOMA Environment (SOMA Rose); J. & J. Baldwin; G. Lang; R. & R. Lowe; the Chinatown Resource Center; S. Hestor; the Chinatown Transportation Research and Improvement Project (Chinatown TRIP); M. Mah; M. Chung; K. Pell; T & C Burkhart; J. Chow; Kaliski, Tof, Spence, & Andersen; Koga & Berge; Matsoukis & Duke.

The letters from these individuals and organizations are reproduced on the pages which follow. Marginal notes refer to the location of responses to the comments contained in Section 11, Responses to Oral and Written Comments.

SOMA ROSE

South of Market Alliance for the Revival of the SOMA Environment

City & County of S.F.
Dept. of City Planing
OCT 19 1995
OFFICE OF
ENVIRONMENTAL REVIEW

Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., San Francisco, CA 94103

October 10, 1995

RE: ALTERNATIVES TO REPLACEMENT OF THE TERMINAL SEPARATOR STRUCTURE

Dear Ms. Sahm,

The SOMA ROSE is an alliance of small businesses and home owners working for the revival of the South of Market neighborhoods. Based on our review of the Draft EIS/EIR, we want to present to you our views regarding the TSS replacement alternatives:

ALTERNATIVES THREE AND FIVE SHOULD BE REMOVED FROM CONSIDERATION, because:

- 11.5.1 A They include the construction of new I-80 on- and off-ramps in an area of the city that is finally experiencing a commercial and residential renaissance. The area of SOMA that would most suffer from the building of these ramps (the intersections of Second, Stillman, Harrison, Bryant, South Park, and Folsom Sts.) is now key to the new life of our neighborhood. Restaurants, retail stores, galleries, a small city park, and the new homes of many San Franciscans, have generated a healthy, substantial pedestrian traffic. Highway ramps would destroy this, and would bring back the kind of crime that we are finally getting rid of. II-234
- 11.4.2 B The Draft EIS/EIR indicates that AM peak hour off-ramp demand would not improve with alternatives 3 and 5. Supposedly, the PM peak hour off-ramp demand would improve slightly. But, vehicles entering Second St. from the Stillman St. ramp would increase in such number, that the already highly congested access to the Bay Bridge would be crippled. The new Second St. off-ramp would be a nightmare gridlock. II-208
- 11.5.4 A II-242
  11.5.3 A Noise and car fume pollution would also increase to unhealthy levels in the heart of our new residential and commercial neighborhood. II-237
- 11.4.7 C The number of street and lot parking spaces that would be lost in the building of the mentioned ramps, would put intense pressure on the few parking spaces available in the area, making our neighborhood less desirable for small businesses and visitors. II-231
- 11.4.2 A II-208
  11.5.6 A Both Second Street options would build an off-ramp right on the face and main entrances of a historical buildings and SOMA landmark –the Clock Tower building– which is now home to aprox. 250 tax payers and thriving small businesses. II-250
- 11.6.4 The two-year duration of the ramp construction process would kill many of the new small businesses in the area, and would make hundreds of residents' life a nightmare. II-260
- If ER Funding is available only to build structures with negative impact on our community, then, by all means, we have to forgo the funds and choose alternatives that are good for San Francisco.

We thank you for your the opportunity to comment on this issue, and look forward to continued correspondence with you.

Sincerely,

Monica DuClaud
Communications Committee for SOMA Rose
461 Second Street # 230, San Francisco, CA 94107

Barbara W. Sahm
Environmental Review Board

San Francisco, California

City & County of S.F.
Dept. of City Planing

October 18, 1995

OCT 20 1995

OFFICE OF
ENVIRONMENTAL REVIEW

RE: REPLACEMENT ALTERNATIVES – EMBARCADERO FREEWAY AND TERMINAL SEPARATOR STRUCTURE (TSS)

Dear Ms. Sahm,

I work in one of the many small businesses located on Stillman Street, South of Market. I have seen the fast and positive changes taking place in this area. Stillman Street is a good example: it has gone from dangerous industrial alley to tree-lined pedestrian friendly street. The changes have improved my business significantly. I know this is true about many business owners and new residents in this part of town. As a voter and tax payer I ask you to ***REMOVE ALTERNATIVES THREE AND FIVE FROM CONSIDERATION.***

Please consider what the building of freeway ramps on Stillman and Harrison Streets would provoke:

11.4.2 B • Vehicles entering Second St. from the Stillman St. off-ramp during PM peak hour would add II-208
to the current gridlock. The new Second St. off-ramp would be a huge gridlock. Far from
11.4.4 A increasing vehicle flow, the intersections of Bryant, Stillman, Harrison and Folsom with II-216
Second St. would be paralysed and back up far into I-80. Access to the Bay Bridge would
become a nightmare.
II-237

11.5.3A&B • Living and working conditions of hundreds of neighbors would suffer with the noise and II-241
car fume pollution increase. During the two-year duration of construction the pollution levels
11.5.4 A&C would be particularly unhealthy, and would jeopardize the many small businesses that II-242
11.6.4 depend on visitors. II-244
II-260

11.4.7 C • Many parking spaces and one of the few parking lots in the area would be lost with the II-231
Stillman St. ramp. Absence of parking spaces in the area will make residents and businesses
suffer alike.

• The area of SOMA that would most suffer from the building of these ramps (the intersec- II-234
11.5.1 A tions of Second, Stillman, Harrison, Bryant, South Park, and Folsom Sts.) is now key to the
new life of our neighborhood. Restaurants, retail stores, galleries, a small city park, and the II-223
11.4.6 A new homes of many San Franciscans, have generated a healthy, substantial pedestrian
traffic. Highway ramps would deter pedestrians and bring back crime and vandalism to the II-237
11.5.2 empty streets.

.4.2 B Building more freeway ramps will not improve traffic or facilitate access to downtown. New
ramps will only bring new traffic jams, noise, pollution, and the disintegration of a new, healthy II-208
11.1.3 neighborhood. Why not invest instead in public transportation and improvement of traffic lights/ II-185
B&C street directions? Why use federal funds to destroy our city? II-186

Sincerely,

Mark Paglietti Design

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OCT 20 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

The ClockTower Lofts Owners' Association
Board of Directors
461 Second Street, #116
San Francisco, CA 94107

October 19, 1995

Ms. Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

RE: The potential rebuilding of the Transbay Terminal Separator Structure

Dear Ms. Sahm,

I am a resident of the ClockTower Lofts (461 2nd Street at Bryant Street) in the Rincon Hill district of San Francisco and President of the ClockTower Lofts Owners' Association. As you may know, there are many new condominiums and other residential structures in this area, and it is now home to numerous tax paying and mostly voter eligible residents. With regards to whether or not to rebuild the on and off-ramps to Highway 101 and the Bay Bridge (also known as the Terminal Separator Structure or "TSS"), I would like you to consider the following observations.

11.1.3 B&C **11.5.1 A** I strongly oppose Alternatives Three and Five with a special opposition to the Second St. Options for those alternatives. As was clearly evident with the removal of the Embarcadero Freeway, the removal of the old TSS has opened up our neighborhood and given it a sense of renewal and potential. The renaissance of this historic part of our city should not be slowed (or worse, reversed) by the construction of new freeway connectors in a residential neighborhood. The City of San Francisco does not need this massive structure rebuilt in order to achieve adequate traffic flow which can be substantially improved by better/additional direction signs as well as better timing of traffic signals. **II-185** **II-186** **II-234**

11.8 Of the remaining Alternatives, I support the recommendation of the Staff Technical Committee that is referred to in the Draft Environmental Impact Report on page 293 as the "DPT Variant." As described, there would be no new off-ramps onto Second St., nor any on-ramp over Second St., with the DPT Variant alternative combining Alternative Four with (only) the expansion of the Fourth St. off-ramp as described in Alternatives Three and Five. **II-268**

11.4.2 A Please note that the Second St. Option of Alternatives Three and Five are particularly undesirable because they include the construction of a new off-ramp onto Second Street and, in essence, directly into a 100+ car garage for the ClockTower Lofts and into what **II-208**

the City of San Francisco has named the ClockTower Building a "Contributory
Building" to the South End Historic District. Second Street is not only the best, but also
the most attractive tree lined route from downtown to an area which includes two parks
11.4.6 A (South Park & South Beach Park, now under construction), a world renowned art **II-223**
showcase (Capp Street Project), restaurants (Cava 555, South Park, Ecco and the Fly
Trap, to name a few), a large gym (Gold's) and numerous clothing outlet and other
retail stores. The construction of a Second Street off-ramp would only endanger and
inconvenience the growing flow of foot traffic to these destinations.

If another reason is needed to remove from consideration the proposed Second Street
off-ramp, it should be noted that it would be a comparatively short off-ramp with little
lead cue room on the freeway (as opposed to the very long lead-in to the Fourth Street
11.4.4 A exit). This limited lead and ramping space would most certainly contribute to further **II-216**
Bay Bridge congestion (making it a safely hazard) as traffic would be induced to take a
new "Last S.F. Exit" which would frequently become backed up due to Second Street
being clogged with traffic congestion, as is now often the case. (Visualize a driver
having to make a quick decision between stopping on the freeway while waiting for the
off-ramp to clear and risking being rear-ended or being forced onto a bridge which will
take them far out of their way.) Furthermore, the construction of a Harrison Street on- **II-237**
11.5.2 ramp would further close in an area which has become opened due to the removal of
the old freeway structure. The Harrison Street on-ramp would also bring more (south **II-208**
11.4.2 B bound Hwy. 101) traffic into an area already congested by East Bay bound traffic trying
to use the two Bay Bridge entrances at Harrison and the top of First Street and Essex
Street.

For the growing number of residents, citizens and visitors who walk the streets in our
neighborhood, the building of a Second Street off-ramp and a new massive concrete and **II-237**
11.5.2 steel on-ramp structure will only close back in our streets and make Second Street more
11.5.1 A intimidating and a less desirable route. While probably well intentioned, the inclusion **II-234**
of the new Second Street off-ramp and Harrison Street on-ramp is flawed in its logic
and would wreak havoc on this developing residential and historical neighborhood.

At this point in time, the positive impact of both a fully functional Highway 280 and an
improved Embarcadero is still unknown. Furthermore, the extension of CalTrain into
11.4.3 the downtown area is much more likely, and when completed should greatly reduce **II-213**
C pressure on our freeway system. Please provide the vision now to allow our
historically significant neighborhood to grow without the negative effects that
rebuilding imposing freeway structures would cause. I thank you for your assistance
and consideration of the above issues.

Sincerely and on behalf of all of the residents of the ClockTower Lofts,

Alan F. Morcos
President
ClockTower Lofts Owners' Association

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OCT 20 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

10 South Park
STUDIO TWO

18 October 1995

Honorable Mayor and Supervisors
City and County of San Francisco

Via Fax: 1 page

Re: Potential rebuilding of the Transbay Terminal Separator Structure

Honorable Mayor and Supervisors:

11.8 I would like to voice my continuing opposition to Alternatives Three and Five and, most particularly the Second Street options for these alternatives. II-268

11.4.2 B Although this South of Market neighborhood is already gridlocked at prime traffic times, if additional access work MUST be provided, I would grudgingly support the DPT Variant (p. 293, EIR) which focuses on expanding the Fourth Street ramp, a traffic configuration which already discourages pedestrian traffic along that transportation artery. II-208

A Sausalito resident for more than twenty years, I purposely left the 'idyllic beauty' of Marin County to buy a home in South Park almost three years ago because I love the diverse, mixed-use, small-scale and pedestrian-oriented quality of this neighborhood, and as a consequence of my move I would support the concept of urban revitalization.

11.4.6 A As a resident of this area, I walk to virtually all my destinations in the City: Second Street is my primary route to clients' offices in the Financial District, and usually my choice when walking at night to the Performing Arts Center at Yerba Buena Gardens. As a pedestrian link to the rest of the City and to the developing amenities at the Yerba Buena Gardens, I would find Second Street severely compromised by a new off-ramp during the day and a complete deterrent at night. II-223

11.4.2 B When my work takes me out of the City and I return by car during the peak evening traffic period, I find I must avoid the Embarcadero and Harrison Street arteries to my neighborhood: travel time from Broadway to South Park along any of the arteries approaching the Bay Bridge is consistently about 30 minutes. By contrast, approaching my neighborhood from Van Ness and Bryant Street where the congestion is lighter, travel time is cut in half. II-208

11.5.1 A Please do not kill the neighborhood renaissance you have recently encouraged by injecting a limb of the deadly asphalt jungle. South Park and Rincon Hill has lost its soul once with the infamous "Second Street Cut," let's not have our auto-driven history repeat itself. II-234

Sincerely,

Alice Rogers

Alice Rogers

cc: Barbara Sahm/SF Planning Dept.
John Schultz/Federal Highway Administration

TO: Barbara W. Sahm
San Francisco Planning Department
FAX: 558-6426
FROM: Louise Bird, 115 South Park, San Francisco. CA 94107
PHONE/ FAX : 415-957-0199/ 415-957-1188

RE: Alternatives Embarcadero Freeway/ Terminal Seperator

I am highly **opposed to Alternatives 3 and 3 B and Alternative 5** because of the II-268
11.8 interference they will cause on Second Street which is often choked to the maximum. The
11.4.2 B original Second Street cut destroyed the Rincon Hill/ South Park neighborhoods . and now II-208
that new developments have increased the residential use of this area for the first time in
11.5.1 A over 100 years, is it worth it to decrease the desirability of living in SOMA by interlacing it II-234
with more freeways and traffic which will drive high paying residents and businesses to
11.1.3 B move elsewhere? I am opposed to Alternative 3 B because this extension feeding to II-185
101 already choked to capacity acts as little more than a holding area , whereas the entry
11.5.2 to 101 at 4th Street is only two blocks away. Another concrete flyway is unsightly and II-237
disruptive to the neighborhoods and its cost does not lighten traffic on 101.

The draft EIR report upgrades the Second St. intersections from an "F" to a "D" rating.
Those **1993 traffic figures do not reflect today's traffic patterns** on all of the South
of Market roadways which were under study. The daily experience of Second and Third
11.4.2 Street traffic . including weekends, is that it is increasing and is often "F" or worse. Past
traffic studies required for the defeated stadium deals have revealed what we in the area II-208
B already know. a series of "F" ratings on these streets. Having my office in South Park
and now living in South Park , I have been a participant in the area since 1983. I can
back up my claim that **traffic in our area is the number 1 concern for residents and
businesses**.

Wonderful and exciting changes are going on now and having endured .along with my
fellow neighbors. the construction process, the days are ripe for enjoying the amenities II-198
11.3.4 provided by that often unpleasant , but always progressive experience. With more
11.4.9 necessary disruptions based on mass transit and other concerns i.e. the arena. stadium . II-232
and Mission Bay , as local residents **the trade off is obviously not there for us to
A endure even more construction for the car,** only to be strapped with the traffic snarls
caused by inappropriate land uses in the first place.

I thought the vision of the future was to provide options for people to reduce their need for
cars .but it became obvious to me that not all people see the transportation future that
11.4.2 B way. In the citizens advisory public comment meeting for the Terminal Seperator on II-208
October 18 a representative from DPT was explaining the timing of the pedestrian walk
light based on projecting into the future of having to accommodate a 70% increase in cars!
That forecast would create a very undesirable situation and I suggest that if you build it II-268
11.8 and they will come. That is not my vision for the future living in the modern part of San
Francisco . **My vision is to have a balance of transportation alternatives that
release people from their dependence on autos .** I don't see it as a loss that we give
up federal highway money.

The **DPT alternative causes the least disruption** to newly formed neighborhoods and
11.1.2 A is the least costly alternative. I really encourage going **underground in front of the** II-175
Ferry Building because that would be the best solution for linking pedestrians to Market
11.1.2 H Street it is worth it to do it right the first time. Another useful addition would create left turn
lanes at Washington and Broadway for easy access to China Town and North Beach. II-183

City & County of S.F.
Dept. of City Planning

OCT 19 1995

OFFICE OF
ENVIRONMENTAL REVIEW

Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., San Francisco, CA 94103

10/15/95

RE: ALTERNATIVES TO REPLACEMENT OF THE EMBARCADERO FREEWAY AND THE TERMINAL SEPARATOR STRUCTURE (TSS)

Dear Ms. Sahm,

I live and have worked for the past eight years, in the SOMA area between Brannan, Harrison, Second and Fourth Streets. I have witnessed the astonishing rebirth of the area, which has improved my business and the quality of my life significantly. I know this is true about many business owners and new residents in this part of town. For this reason, I ask that ALTERNATIVES THREE AND FIVE BE REMOVED FROM CONSIDERATION.

These are critical considerations that the Draft EIS/EIR did not mention:

1. TRAFFIC: Vehicles entering Second St. from the Stillman St. off-ramp during PM peak hour
11.4.2 B would add to the current gridlock. The new Second St. off-ramp would be a huge gridlock. Far II-208
from increasing vehicle flow, the intersections of Bryant, Stillman, Harrison and Folsom with II-216
11.4.4A Second St. would be paralysed and back up far into I-80. Access to the Bay Bridge would
become a nightmare.

2. POLLUTION: Living and working conditions of hundreds of neighbors would suffer with the II-237
11.5.3A&B noise and car fume pollution increase. During the two-year duration of construction the pollu- II-241
11.5.4A&C tion levels would be particularly unhealthy, and would jeopardize the many small businesses
11.6.4 that depend on visitors. II-242

II-244
3. PARKING: Many parking spaces and one of the few parking lots in the area would be lost with
11.4.7 C the Stillman St. ramp. Absence of parking spaces in the area will make residents and busi- II-260
nesses suffer alike.

II-231
4. CRIME: The area of SOMA that would most suffer from the building of these ramps (the intersections of Second, Stillman, Harrison, Bryant, South Park, and Folsom Sts.) is now key to the new life of our neighborhood. Restaurants, retail stores, galleries, a small city park, and the new homes of many San Franciscans, have generated a healthy, substantial pedestrian traffic. Highway ramps would deter pedestrians and bring back crime and vandalism to the empty streets.

11.5.2
5. VISUAL QUALITY AND URBAN DESIGN: Both Second Street options would build an off-ramp II-237
right on the face and main entrances of a historical buildings and SOMA landmark –the Clock Tower building– which is now home to aprox. 250 tax payers and thriving small businesses. Also, an area of town that is rapidly acquiring the beauty and flavor typical of San Francisco, would succumb to depressing concrete structures.

11.1.3 B&C To improve regional connectivity and transit we need better public transportation and better II-185
traffic lights/ direction signs...not more freeway ramps. I urge you to make a decision that will II-186
enhance, not kill, the Rincon Hill-South of Market neighborhoods.

Sincerely,

Steve Caramia, Caramia Design
35 Stillman Street, Suite 108, San Francisco, CA 94107

CARAMIA DESIGN
35 Stillman St., suite 108 San Francisco, CA 94107
PH 415 543.0490 FX 415 543.0235

October 20, 1995

Barbara W. Sahm, Environmental Review Officer
San Francisco Planning Department
1650 Mission St, SF CA 94103

RE: Replacement Alternatives Three and Five — Embarcadero Freeway and Terminal Separator Structures (TSS)

Dear Ms. Sahm,

Mine is one of the many very small businesses that have cropped up and prospered in the
booming and rapidly changing South of Market area that has been targeted for new on- and off-ramp
structures. My little street, Stillman, for example, has gone from a dangerous and neglected industrial II-268
11.8 alley to a tree-lined pedestrian-friendly street that is home to residents and small businesses alike. II-234
11.5.1 A I opened my office five years ago, and the improving nature of the neighborhood has only had a
positive effect on my business.

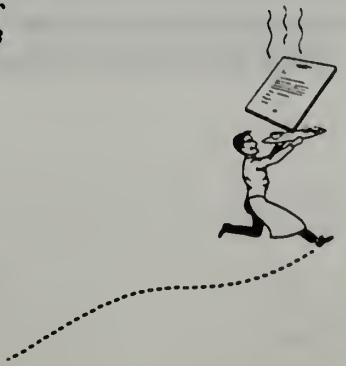
11.6.4 Two years of construction of a ramp of questionable merit will result in the disruption and perhaps II-260
collapse of business for me and many other small business owners near me. Also **please consider
the effect of the finished ramp on the fragile new life of the emerging neighborhood**
of retail stores, food shops, new homes, and substantial pedestrian traffic.

Ask yourself: Will the *advantages* of these ramps outweigh the *detrimental effects* on the existing neighborhood? As the draft EIS/EIR shows, Alternative Two is by far the better choice in this regard.

I urge you to **REMOVE ALTERNATIVES THREE AND FIVE** from consideration!

Thank you,

Steve Caramia



City & County of S.F.
Dept. of City Planing
OCT 23 1995
OFFICE OF
ENVIRONMENTAL REVIEW

Rick & Rebecca Lowe
355 Bryant Street, #209
San Francisco, CA 94107

October 19, 1995

Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: The potential rebuilding of the Transbay Terminal Separator Structure - please add to file for the final Environment Impact Report

Dear Mr. Schultz,

My husband and I have been homeowners and residents in the Rincon Hill
district of San Francisco for the past 4 years. The City's decision to begin to
build a young community in this area by changing the zoning regulations was a
very exciting opportunity for my husband and I. Encouraged by the City's II-268
11.8 commitment to this area, we chose this neighborhood as our new home. Our
11.5.1 A community has become a new and exciting residential neighborhood that we are
proud to be a part of. With regard to whether or not to rebuild the on and off- II-234
ramps to Highway 101 and the Bay Bridge ("Terminal Separator Structure", or
"TSS"), I ask that you consider the following:

I **strongly oppose** Alternatives Three and Five with a special opposition to the Second St. Options for those alternatives. The removal of the old TSS has opened up and revitalized this historic part of our city. Construction of new freeway connectors in what is now a residential neighborhood would be devastating. Does the city really need these massive structures rebuilt? Simply putting more cars in the sky will not solve the traffic flow problems.

I encourage you to consider the recommendation of the Staff Technical
11.1.3 Committee that is referred to in the Draft Environmental Impact Report on page II-185
B&C 293, as the DPT Variant. In addition, I encourage a review and study of II-186
additional/better direction signs, as well as better timing of traffic signals. This
continues to be a problem in the South of Market Area.

With all the recent developments, our neighborhood is becoming a desirable
area in which to stroll in the evenings and weekends. You will often see many
11.4.6 A young families in South Park with their small children. Additional on/off ramps in II-223
our neighborhood would result in an unsafe environment for this to continue. A
community that has been growing and flourishing for the past several years
would come to a stop. Please help us nurture and grow our community by
opposing Alternatives Three and Five. Thank you for your consideration.

Sincerely,

Rebecca Lowe

Rebecca Lowe

City & County of S.F.
Dept. of City Planing

OCT 23 1995

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OCT 23 1995

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

461 Second Street, #T-559
San Francisco, CA 94107
October 20, 1995

Ms. Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: The Potential Re-Building of the Transbay Terminal Separator Structure

Dear Ms. Sahm:

I am writing to convey my strong opposition to Alternatives Three (versions A & B) and Five (versions A & B) of the proposed Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure.

More than 100 years ago, the City foolishly allowed the "Second Street Cut," an infamous effort to eliminate the street's steep grade as it crossed Rincon Hill. The cut was one of the prime reasons for the decline of Rincon Hill/South Park as an attractive, viable neighborhood.

11.5.1 A

I believe Alternatives Three and Five will have the same negative impact on the South of Market (SOMA) area by putting more cars on neighborhood streets. As you know, SOMA is in the process of being revitalized with the return of residents, restaurants, and an variety of business and retail establishments. In particular, Second Street, with its interesting mix of buildings and land uses and its stunning views of the Financial District, is a symbol of this rebirth. It is currently the preferred pedestrian pathway between SOMA and the Financial District. II-234

Both Second Street and the entire SOMA neighborhood will suffer irreparable damage if the City allows the construction of an off-ramp at Second Street and an aerial on-ramp at Harrison Street.

I strongly urge you to eliminate Alternatives Three (versions A & B) and Five (versions A & B) from consideration. Thank you.

Sincerely,

Gary T. Lang

City & County of S.F.
Dept. of City Planing

SEP 12 1995

OFFICE OF
ENVIRONMENTAL REVIEW

DESIGN • IN — *sync*
461 SECOND STREET C-216
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City & C[illegible] of S.F.
De[illegible] [illegible]ning

ENVIRONM[illegible] [illegible]IEW

September 9, 1995

Barbara W. Sahm
Environmental Review Office, San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: Comment on Alternatives to Replacement of the Embarcadero Freeway & TSS

Dear Ms. Sahm:

I have reviewed the Draft Environmental Impact Report and have a few comments for consideration. My perspective may be defined and relegated to those stemming from residents of the Rincon Hill and South Park neighborhood. Thank you for your time and consideration.

I have lived three years at the ClockTower Lofts, 461 2nd Street, at the intersection of 2nd and Bryant streets, and hemmed in by the Sterling Street on-ramp and the mainline I-80/US101 freeway structure. Upon review of the Draft Report, I would like to express my regard to those that prepared this manuscript, for it is both thorough and insightful. I realize that my comments could have been better appreciated had they been delivered during this research process, but hopefully, at best they can be considered in determining factors for choosing the best final alternative construction.

I feel that all the alternatives have their merit and positive and negative elements. Some alternatives however, appear to provide minimal positive benefit, and are outweighed by negative elements. The following list of elements are of most concern to me:

- 11.1.3B The westbound on-ramp from Harrison Street to I-80 westbound: This seems like a minute improvement to all drivers, who now II-185
11.4.4A easily continue along Harrison St. for 2 more blocks to the 4th Street on-ramp. Additionally, there is a negative in that it will cause a
merge congestion area sooner on the mainline I-80/US 101 for westbound traffic, which is already barely recovering from the off- II-216
ramp merge congestion caused at the first three off-ramps on the westbound direction (Harrison st., Fremont st. and the 5th st. off-
ramps—1 on the right, 2 on the left side of freeway). It currently seems to work to first allow westbound on-ramp traffic to merge
onto that congested freeway at 4th St. anyways. Any modification ought to be to add a new freeway lane on I-80/US 101 from the 4th
St. on-ramp along to the US101 central freeway split farther down in the westbound direction. The main negative of concern to the
neighborhood would be the addition of an overpass at 2nd street, which would further cut views, airspace and isolate the South Park II-223
11.4.6A neighborhood from downtown and the rest of SOMA. 2nd St. is also the main commute walk for hundreds of multimedia workers to
11.5.2 and from the MUNI and BART lines on Market St. This overpass would be a detraction to pedestrian traffic. II-237

- 11.1.3C The eastbound off-ramp to Second street: This structure not going to do much to help anyone. It might cause more congestion on II-186
the eastbound I-80 due to additional rightbound vehicle merging after the Fourth St. exit. It would be more convenient for traffic to
use Third St. anyways to get downtown, as it is one-way with 4 lanes, and also crosses Market Street. 2nd St. doesn't cross Market II-216
11.4.4A and is two-way, and more often congested without any left turn pockets at any of the intersections (Howard, Harrison Sts.) This
ramp will discourage pedestrian traffic along 2nd St.

- The new Fremont exit ramp onto Folsom is a good idea however. Hopefully, Folsom St. lights will be re-timed to allow a constant flow onto The Embarcadero.

Here are a few new ideas:

- 11.1.2B Alter the Sterling street side to create 2 lanes of traffic moving west on Bryant from The Embarcadero all the way onto the Sterling
on-ramp at all times; however, remove the option of entering Sterling on-ramp from the eastbound Bryant St. direction. (one lane of II-177

traffic flowing east on Bryant would therefore be permitted to go straight across 2nd St. and down Bryant St. without the option of turning into the Sterling St. on-ramp; other eastbound Bryant St. traffic would be realigned as such: 2 lanes to go left onto 2nd St., 1 lane to go right onto 2nd St.). This would encourage greater use of The Embarcadero and assist with relieving the congested southbound mid-Embarcadero traffic in the PM (vehicles could easily continue on The Embarcadero past Harrison St. to Bryant St.) Eastbound Bryant St. traffic seeking an eastbound I-80/Bay Bridge on-ramp may turn left onto 2nd St. and go barely much further up to Harrison St. and catch on-ramps on that side of the freeway. Or they could continue straight down Bryant St. until they reach Main St. and turn left there and back over to Harrison St. to other on-ramps. Because the Sterling St. entrance to the Bay Bridge is only configured for one entering lane onto the Bay Bridge eastbound, at some point there would have to be a merging of the two lanes. Perhaps one lane of Westbound Bryant on-ramp approach traffic could continue to the Sterling St. entrance, and the 2nd right lane of approaching traffic could veer off earlier at Rincon St. and enter the freeway at the old flyover entrance (perhaps reserve right lane for trucks only). With the extra capacity of Bryant St. between 2nd and Sterling Sts., you could allow room for enlarging the sidewalk on the northside, or create a mini urban lunch seating plaza for the large number of multimedia workers on the south side in front of Gold's Gym, who have recently inhabited this neighborhood.

- Widen the sidewalk along 2nd St. from Townsend St. on the south to Harrison St. on the north on the westside of the street (this includes the formal entrance to South Park, which should receive some special treatment, with trees, etc.) This could be accomplished by eliminating parking or a lane in one direction. Also create a permanent class 3 bike lane along 2nd St. from Market St. all **II-223** **11.4.6A** the way to Townsend St. Bicyclists are a permanent presence on 2nd St., and there is heavy bike messenger traffic in this part of SOMA during the day. The pedestrian traffic has not seriously been monitored, researched and considered in this Draft Report. As a resident of over 3 years, I can attest to the great increase in foot traffic. At PM rush hour, hundreds of workers trail back down 2nd St. north to the BART and MUNI lines. There is more pedestrian movement from within this neighborhood than anyone can imagine, and very few workers here and further down on Townsend (multimedia gulch) drive, mainly because most of these industrial buildings do not have parking spaces and underground garages. Most of the vehicle gridlock is from commuters from outside the area. There is no use in trying to accommodate drivers any further with major new ramps in my opinion, because the reality is that the I-80/US 101 is very congested and cannot carry any more traffic anyways. The Draft Report mentions already that these new ramps will cause increased overall PM/AM congestion time on the street level. Street congestion is a major drawback and danger for pedestrians and bicyclists. Drivers usually rudely block crosswalks when there is gridlock. I have great difficulty crossing intersections at 2nd and Bryant and 2nd and Harrison when there is a back-up (caused by a mainline freeway "incident", which is about 30% of the time). Since "transit is the priority" and only long-term option (barring building another mainline freeway and bridge), all efforts should be made to accommodate pedestrians and alleviate the common gridlock on 2nd St., which has overwhelmingly become the main choice for pedestrian traffic into and out of South Park to the MUNI and BART lines on Market. Widening the streets will create a less hostile environment for pedestrians. It will also ensure that as trees mature, they will not be as susceptible to loosing limbs to trucks due to a too-close proximity to the curb.

As you can see, my main concern is 2nd St., and nurturing and fostering its development into the main "commercial and pedestrian" avenue in the Rincon Hill and South Park neighborhood. There are numerous building conversions being undertaken as I write that will continue to transform this area into a real neighborhood. There is also a good possibility that there will be retail/restaurant/service business cropping up further down on 2nd St. near the entrance to South Park. With the new park being constructed at the foot of 2nd **11.5.1 A** St. and King St., and numerous condominium projects being developed on that end, there is no reason not to assist with pedestrian **II-234** movement by giving 2nd St. more room for sidewalk and making some valuable restrictions on vehicle access to the Sterling St. on-ramp. Additionally, there is significant concern about adding off-ramps or on-ramps in the immediate neighborhood for many reasons, most of which relate to vehicle traffic and the offensiveness of the automobile towards bicyclists and pedestrians.

Sincerely,

Raymond Pajek
Architecture Control Committee Chairperson, The ClockTower Lofts

Dave Gordon, Agent
State Farm Insurance Companies

August 28, 1995

City & County of S.F.
Dept. of City Planing
AUG 29 1995
OFFICE OF
ENVIRONMENTAL REVIEW

Barbara Sahm
Environmental Review Office; SF Planning Dept
1660 Mission St.
San Francisco, Ca 94103

Dear Ms. Sahm,

I own a property on Stillman Street and operate my business throughout the financial and SOMA districts. I hope that there will be a way to avoid an offramp from 101 to 2nd St using Stillman Street.

11.8 The reason I am so emphatic on this issue is that those of us who live in the area are doing our best to II-268
create and maintain a neighborhood appeal. We are planting trees through the Friends of The Urban
11.5.1A Forest; we are doing our best to reduce parking congestion by pursuing limited time without resident II-234
permits and we are developing a "pride" in our area by taking care of our properties.

11.4.7C

The construction of an offramp from highway 80/101 onto Stillman would make a difficult parking and II-231
congestion problem even worse. It would take any morsel of "neighborhood feel" away. This would
further impair this area for use by residences and small business.

Please do what you can to help prevent the utter destruction of this street along with the viability of the residences, offices and business ventures which make Stillman Street their home.

Thanks for your help!

Sincerely,

Dave Gordon

690 Monterey Blvd.
San Francisco, CA 94127

Bus: 415-584-8000
Fax: 415-584-5000

LAW OFFICES OF

Arthur L. Meader, III

703 Market Street, Suite 1012
San Francisco, CA 94103
(415) 777-5727
(415) 777-5799 Facsimile

October 9, 1995

Barbara W. Sahm
Environmental Review Officer
S.F. Planning Dept.
1660 Mission St.
San Francisco, CA 94103

re: TTSS rebuild issue

Dear Ms. Sahm:

I recently attended the public hearing on September 27th regarding
alternatives to replacement of the Embarcadero Freeway and Transbay II-268
11.8 Terminal Separator Structure (TTSS). I live at 461-2nd Street (the
Clocktower) and add my voice to those who strongly oppose II-234
11.5.1A Alternatives Three and Five as rebuilding possibilities.

I see this matter, as do others, as a Quality of Life Issue (QLF).
The South of Market area is enjoying a wonderful renaissance now
and is much more user-friendly for those on foot than it was when
the hydra-headed TTSS was in place. I think it is important to
retain the current feeling. Rebuilding the freeway links suggested
11.4.2A in Alternatives Three and Five is not the way to achieve this. The II-208
off-ramp onto Second Street, right across from the Clocktower
driveways, seems particularly ill-conceived. This engineering
buffoonery would lead only to increased traffic problems on Second
Street, regardless of whatever coincident "improvements" were to be
made, as anyone who has spent any time in the area would know.

As various speakers delivered their comments at the public hearing, I realized I shared the feeling that such mammoth public works as are in question here need to be geared to more humane concerns than making sure x number of cars can proceed past point y within z number of minutes.

The re-born Embarcadero area, with removal of the overhead freeway, shows what can be done when right thinking is at work. Hopefully, the same right thinking will prevail regarding the TTSS.

Very truly yours,

ARTHUR L. MEADER, III

1
Gitelman
Ahmadi

c.c

Post-It™ brand fax transmittal memo 7671 | # of pages ▸ 2

To Sidney Unobskey	From Baldwin
Co.	Co.
Dept.	Phone # 5438395
Fax # 558-6409	Fax #

September 22, 1995

Honorable Frank M. Jordan
San Francisco, California

RE: The potential rebuilding of the Transbay Terminal Separator Structure

RECEIVED
OCT 04 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Dear Mr. Jordan,

I am a resident of the ClockTower Lofts located between Second Street, Bryant Street, Sterling Street, and the Bay Bridge itself. As you may know, the ClockTower Lofts include 127 condominium residences with roughly 200 (tax paying and mostly voter eligible) residents. With regards as to whether or not to rebuild the on and off-ramps to Highway 101 and the Bay Bridge (also known as the Terminal Separator Structure or "TSS"), I would like you to consider the following observations.

I strongly oppose Alternatives Three and Five with a special opposition to the Second St. Options II-234
for those alternatives. As was clearly evident with the removal of the Embarcadero Freeway, the
11.5.1 A removal of the old TSS has opened up our neighborhood and given it a sense of renewal and
potential. The renaissance of this historic part of our city should not be slowed (or worse,
reversed) by the construction of new freeway connectors in a residential neighborhood. The City II-185
11.1.3 B&C of San Francisco does not need this massive structure rebuilt in order to achieve adequate traffic II-186
flow which can be substantially improved by better/additional direction signs as well as better
timing of traffic signals.

Of the remaining Alternatives, I support the recommendation of the Staff Technical Committee
11.8 that is referred to in the Draft EIR on page 293 as the "DPT Variant". As described, this new II-268
Alternative would combine Alternative Four with (only) the expansion of the Fourth St. off-ramp
as described in Alternatives Three and Five.

Please note that the Second St. Option of Alternatives Three and Five are particularly undesirable
because they include the construction of a new off-ramp onto Second Street and, in essence, II-234
11.5.1 A directly into our building and into what is now a residential neighborhood with substantial
pedestrian traffic. Second Street is not only the best, but also most attractive tree lined route from
downtown to an area which includes two parks (South Park & South Beach Park, now under II-223
11.4.6 A construction), a world renown art showcase (Capp Street Project), restaurants (Cava 555, South
Park, Ecco and The Fly Trap, to name a few), a large gym (Gold's) and numerous clothing outlet
and other retail stores. The construction of a Second Street off-ramp would only endanger and
inconvenience the growing flow of foot traffic to these destinations.

If another reason is needed to remove from the consideration this proposed Second Street off-
ramp, it should be noted that it would be a comparatively short off-ramp with little lead cue room
11.4.4 A on the freeway (as opposed to the very long lead-in to the Fourth Street exit). This limited lead II-216
and ramping space would most certainly contribute to further Bay Bridge congestion (making it
a safety hazard) as traffic would be induced to take a new "Last S.F. Exit" which would
frequently become backed up due to Second Street being clogged with traffic congestion, as is
now often the case. (Visualize a driver having to make a quick decision between stopping on the
freeway while waiting for the off-ramp to clear (risking being rear-ended) or being forced onto II-208
11.4.2 B a bridge which will take them far out of their way.) Furthermore, the construction of a Harrison
11.5.2 Street on-ramp would further close in an area which has become opened due to the removal of the II-237
old freeway structure. The Harrison Street on-ramp would also bring more (south bound Hwy.
101) traffic into an area already congested by East Bay bound traffic trying to use the two Bay
Bridge entrances at Harrison and the top of First Street and Essex Street.

For the growing number of residents, citizens and visitors who walk the streets in our neighborhood, the building of a Second Street off-ramp and a new massive concrete and steel on-ramp structure will only close back in our streets and make Second Street more intimidating and a less desirable route. While probably well intentioned, the inclusion of the new Second Street off-ramp and Harrison Street on-ramp is flawed in its logic and would reek havoc on this developing residential neighborhood.

At this point in time, the positive impact of both a fully functional Highway 280 and an improved
Embarcadero is still unknown. Furthermore, the extension of CalTrain into the downtown area II-213
11.4.3 C is much more likely, and when completed should greatly reduce pressure on our freeway system.
Please provide the vision now to allow our historically significant neighborhood to grow without
the negative effects that rebuilding imposing freeway structures would cause. I thank you for your
assistance and consideration of the above observations and issues.

Sincerely,

Jane & Jerry Baldwin

Pell Development Company
Four Star Investment & Management

600 Harrison Street · Suite 100
San Francisco, CA 94107
415/543-4330 FAX 415/227-0120

Ahmadi

October 19, 1995

RECEIVED
OCT 20 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Via Facsimile: 558-6409

Commissioner Sidney R. Unobskey, President
City Planning Commission
San Francisco, California

Dear Commissioner Unobskey:

We own 600 Harrison Street, a six story office building in the Rincon Hill district of San Francisco and are concerned about some of the proposed Terminal Separator Structure (TSS) Alternatives:

11.4.2 B Alternatives Three and Five would be a step backward in the development and II-208
beautification of this neighborhood. Constructing an additional on-ramp on Harrison Street
11.4.2 A&B would bring more south bound traffic from Hwy. 101 into an area already congested by
traffic headed to the East Bay on two Bay Bridge entrances. The option to construct a new II-208
off-ramp exiting on to Second Street is damaging because it would exit into a T-intersection
right in front of a 100+ car garage into what is already an extremely traffic clogged street. II-216
11.4.4 A The proposed Second Street off-ramp would be comparatively short in length with little cue
room on the freeway (as opposed to the very long lead-in to the Fourth Street exit). This
would contribute to further Bay Bridge congestion because traffic would be encouraged to
11.1.3 C take the "Last S.F. Exit," adding to the already congested Second Street. In addition, Second II-186
Street is not a good traffic artery into the downtown area.

We support the DPT Variant, one of the alternatives listed in the Environmental
Impact Report (explained on pg. 293). This alternative, as described, will have no new off-
11.8 ramps onto Second Street, nor any new on-ramps off Harrison Street or over Second Street. II-268
Instead, the DPT Variant Alternative combines Alternative Four (improving signs, traffic
lights, traffic flow, etc.) with the expansion of the Fourth Street off-ramp.

11.4.6 A Both Second and Harrison Streets are home to numerous residences, popular
restaurants, parks, retail stores and businesses. An additional off-ramp or on-ramp would II-223
only endanger and inconvenience the growing flow of both foot and car traffic to these
11.5.1 A destinations. It would lower values of real estate in the area and would stifle future growth II-234
and improvement.

Please consider the importance of continuing to foster the re-development of the Rincon Hill district and support the "DPT Variant" Alternative for the Terminal Separator Structure.

Sincerely,

Karen S. Pell

Karen S. Pell

KSP/jh

[illegible]
2 pages

Thomas H. and Carol A. Burkhart
The Clocktower Building
461 Second Street, #651
San Francisco, CA 94107

RECEIVED
OCT 23 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

October 17, 1995

Sidney R. Unobskey, President
City Planning Commission
Fax #558-6409

Re: The potential rebuilding of the Transbay Terminal Separator Structure

Dear Commissioner Unobskey:

HELP!
How often must the residents of this exciting and developing area of the City write to our public officials requesting that we be treated with the same respect and regard as the residents of other neighborhoods in the City? Why do we find ourselves constantly sitting down to draft yet another letter to prevent enormous signs from being erected on the buildings surrounding us, sports arenas from being constructed in our backyards and terminal separators from being rebuilt at our front doors? Once again........

We are residents of the Clocktower building at South of Market (actually the clocktower itself is part of our unit so we feel a special concern and affection for this building.) There are approximately 127 other family-living units in this building alone. In addition, a significant number of the other historic buildings in this area have been converted into live/work lofts. We are blessed with a number of wonderful art museums, galleries, and some of the most popular and outstanding restaurants in the city. We feel very fortunate to call this area our home. Please listen to ours and other residents' concerns to this latest potential invasion into our neighborhood:

11.5.1 A My husband and I strongly oppose Alternative Three and Five II-234
and are particularly adverse to the Second Street Options for
those alternatives. At the time that the TTS was torn down, II-237
11.5.2 the renaissance that has become the new South of Market was
in its beginning stages. Its removal, in fact, contributed
to that renewal by creating a great deal more openness in the
area in and around Second Street. To rebuild this structure
would close off once again a substantial part of our new
neighborhood and significantly detract from the attraction of
this area which includes two parks (South Beach--now under
construction--and South Park and numerous cultural
attractions (see previous paragraph.)

2nd of 2 pages

11.5.6 Please help us preserve this vital and historic neighborhood.
A The Clocktower building, built in 1909, has been declared an historic building in the city. Once, many years ago, a senator prevented freeway entrances to the Bay Bridge from running directly through the area on which this building was built (which would, of course, have resulted in its being demolished) because of his concern for preserving the historic buildings of San Francisco, You have a similar opportunity to encourage the continued growth and development of this historic part of our city by NOT approving Alternative Three and Five (particularly the Second Street options) which would negatively impact our South of Market burgeoning neighborhood. II-250

Thank you for your consideration of the concerns of the South of Market residents.

Sincerely,

Carol A. Burkhart

Carol A. Burkhart

Thomas H. Burkhart

1 of 2

Ahmadi

FAX MEMO

22 October, 1995

Mr. Sidney R. Unobskey, President
City Planning Commission
San Francisco, California

RECEIVED
OCT 23 1995
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

RE: The potential rebuilding of the Transbay Terminal Separator Structure

Dear Mr. Unobskey,

I would like to express my concern over the city's decision on whether or not to rebuild the on/off-ramps to Highway 101 and the Bay Bridge, also known as the Terminal Separator Structure (TSS). I am a resident of the ClockTower Building and also work in a office at the nearby South Park. Like any other people who live and work in this neighborhood, any construction in this area will seriously affect our everyday lives. I
would like you to consider my following observations. II-234

11.5.1 A I strongly oppose Alternatives Three and Five with the Second Street Off-ramps Options. It is clear that
this neighborhood has been revitalized by the removal of the old TSS. The construction of new freeway off- II-185
11.1.3 C ramp will put a substantial impact on the growth of this renewed residential neighborhood. The City of San II-186
&B Francisco does not need this massive and expansive structure rebuilt in order to achieve adequate traffic flow
which can be substantially improved by other creative solutions such as better/addition signs, more effective
timing of traffic signals, and better pubic transportation system.

11.8 I support the recommendation of the Staff Technical Committee that is referred to in the Draft II-268
Environmental Impact Report on page 293 as the "DPT Variant". As described, there will be no new off-ramps
onto Second Street, nor any on-ramps over Second Street, with the DPT Variant alternative - combining
Alternative Four with only the expansion of the Fourth Street off-ramp as described in Alternatives Three and
Five.

11.4.2 B The Proposed Second Street off-ramp and Harrison Street on-ramp will definitely bring more traffic into II-208
an area already congested by the East bay bound traffic trying to use the two Bay Bridge entrances at Harrison
and the top of First Street and Essex Street. The increase of traffic flow will deteriorate the living quality of
11.4.2 A this area. The new Second Street off-ramp will also create direct conflict with the 100 car garage for the II-208
11.4.6 A ClockTower building as well as hazardous condition for pedestrian traffic on street level. Please note that
there has been a substantial increase in pedestrian traffic along Second Street because this is the most II-223
attractivetree lined route from downtown to an area which includes two parks (South Park and South Beach
Park, now under construction), a well known art gallery (Capp Street Project), popular restaurants and clubs.

11.5.2 numerous retail stores, and all the newly constructed residential complexes. Furthermore, the construction of a Harrison Street on-ramp over Second Street will once again create a imposing visual barrier to this area as what the old TSS has done before its removal. II-237

11.4.4 A In addition to the list of negative effects of new freeway off-ramp, this would be a rather short off-ramp with little lead cue room on the freeway (as opposes to the very long lead-in to the Fourth Street exit). This limited lead and ramping space would certainly contribute to further Bay Bridge congestion as traffic would be induced to take a new "Last S.F. Exit" which would frequently become backed-up due to Second Street being clogged with traffic going up to Bay Bridge. as is now often the case. This also create a hazardous driving condition on freeway as a driver has to make a quick decision between stopping on the freeway while waiting, with a risk of being rear-ended, for the off-ramp to clear or being forced onto the bridge which will take them far out of the way. II-216

I purchased a loft in the ClockTower because I work in a office at South Park two blocks away from the my building. By doing this, I completely eliminated the need of driving to work or even taking any public transportation. I try to do my share to reduce the damage to the environment which mainly caused by II-189
11.1.3 F automotive. I believe that a lot of the people living in this neighborhood try to do the same. This is also the reason I strongly oppose a new Second Street off-ramp and Harrison Street on-ramp because this, in a long run, will unnecessarily increase the traffic volume on freeway and on local streets in this area and in turn worsen the living quality in this neighborhood. More cars, more trash, more air and noise pollution.

11.4.3 C The future extension of CalTrain into downtown area will certainly reduce the pressure on the freeway system. Moreover, the fully functional Highway 280 and improved Embarcadero will promise a positive impact on the traffic congestion. Please provide the vision now to allow our historically significant neighborhood to grow without the negative effects that rebuilding imposing freeway structures would cause. II-213

Thank you for your assistance and consideration.

Sincerely,

Johnson Chow

RECEIVED
OCT 2 3 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

October 20, 1995

DELVERED VIA FAX

Honorable Sidney R. Unobskey
San Francisco, California

RE: The potential rebuilding of the Transbay Terminal Separator Structure

Dear Commissioner Unobskey,

I am a resident and/or work in the Rincon Hill district of San Francisco. As you may know, there are many new condominiums and other residential structures in this area, and it is now home to numerous tax paying and mostly voter eligible residents. With regards as to whether or not to rebuild the on and off-ramps to Highway 101 and the Bay Bridge (also known as the Terminal Separator Structure or "TSS"), I would like you to consider the following observations.

II-185
11.1.3 B&C I strongly oppose Alternatives Three and Five with a special opposition to the Second St. Options II-186
for those alternatives. As was clearly evident with the removal of the Embarcadero Freeway, the
removal of the old TSS has opened up our neighborhood and given it a sense of renewal and
potential. The renaissance of this historic part of our city should not be slowed (or worse, II-234
11.5.1A reversed) by the construction of new freeway connectors in a residential neighborhood. The City
of San Francisco does not need this massive structure rebuilt in order to achieve adequate traffic
flow which can be substantially improved by better/additional direction signs as well as better
timing of traffic signals.

11.8 Of the remaining Alternatives, I support the recommendation of the Staff Technical Committee II-268
that is referred to in the Draft Environmental Impact Report on page 295 as the "DPT Variant".
As described, there would be no new off-ramps onto Second St., nor any on-ramp over Second
St., with the DPT Variant alternative combining Alternative Four with (only) the expansion of the
Fourth St. off-ramp as described in Alternatives Three and Five.

11.4.2 A Please note that the Second St. Option of Alternatives Three and Five are particularly undesirable II-208
because they include the construction of a new off-ramp onto Second Street and, in essence,
directly into a 100+ car garage for the ClockTower Lofts and into what is now a residential
11.4.6 neighborhood with substantial pedestrian traffic. Second Street is not only the best, but also most
A attractive tree lined route from downtown to an area which includes two parks (South Park & II-223
South Beach Park, now under construction), a world renown art showcase (Capp Street Project),
restaurants (Cava 555, South Park, Ecco and The Fly Trap, to name a few), a large gym (Gold's)
and numerous clothing outlet and other retail stores. The construction of a Second Street off-ramp
would only endanger and inconvenience the growing flow of foot traffic to these destinations.

11.4.4 A If another reason is needed to remove from the consideration this proposed Second Street off- II-216
ramp, it should be noted that it would be a comparatively short off-ramp with little lead cue room
on the freeway (as opposed to the very long lead-in to the Fourth Street exit). This limited lead
and ramping space would most certainly contribute to further Bay Bridge congestion (making it
a safety hazard) as traffic would be induced to take a new "Last S.F. Exit" which would
frequently become backed up due to Second Street being clogged with traffic congestion, as is II-237
now often the case. (Visualize a driver having to make a quick decision between stopping on the
freeway while waiting for the off-ramp to clear (risking being rear-ended) or being forced onto
11.5.2 a bridge which will take them far out of their way.) Furthermore, the construction of a Harrison
Street on-ramp would further close in an area which has become opened due to the removal of the II-208
11.4.2 B old freeway structure. The Harrison Street on-ramp would also bring more (south bound Hwy.
101) traffic into an area already congested by East Bay bound traffic trying to use the two Bay
Bridge entrances at Harrison and the top of First Street and Essex Street.

II-237
11.5.2 For the growing number of residents, citizens and visitors who walk the streets in our
neighborhood, the building of a Second Street off-ramp and a new massive concrete and steel on-
ramp structure will only close back in our streets and make Second Street more intimidating and
11.5.1 A a less desirable route. While probably well intentioned, the inclusion of the new Second Street II-234
off-ramp and Harrison Street on-ramp is flawed in its logic and would reek havoc on this
developing residential neighborhood.

At this point in time, the positive impact of both a fully functional Highway 280 and an improved Embarcadero is still unknown. Furthermore, the extension of CalTrain into the downtown area is much more likely, and when completed should greatly reduce pressure on our freeway system. Please provide the vision now to allow our historically significant neighborhood to grow without the negative effects that rebuilding imposing freeway structures would cause. I thank you for your assistance and consideration of the above observations and issues.

Sincerely,

Ray

Cheryl Spence

Carl Anderson

355 Bryant Street No. 206 San Francisco CA 94107

RECEIVED
OCT 17 1995
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

October 17, 1995

Lu Blazej
San Francisco, CA

Delivered Via Fax

Dear Director Blazej,

RE: THE POTENTIAL REBUILDING OF THE TRANSBAY TERMINAL SEPARATOR STRUCTURE

We are residents of the Rincon Hill district of San Francisco. We are pleased with the direction our neighborhood has taken in recent years, thanks to the long-range, tasteful development planning that originated in City Hall. The revamping of the Embarcadero and the South Beach Marina and the Yerba Buena / Museum of Modern Art complexes are glorious, optimistic examples of the possibilities of civic government at work. And as part of the greater transformation of the South of Market area, the redevelopment of Rincon Hill as a mixed residential/small business neighborhood and as a global center of multimedia technology wisely anticipates the look and function of future neighborhoods.

As you may know, there are many new condominiums and other residential structures in the Rincon Hill area, and it is now home to numerous tax paying and mostly voter eligible residents. With regard to the issue of rebuilding (or not rebuilding) the on and off-ramps to Highway 101 and the Bay Bridge (also known as the Terminal Separator Structure or "TSS"), we would like you to consider our following positions: II-185

11.1.3 B&C **We strongly oppose Alternatives Three and Five with a special opposition to the Second Street Options for those alternatives.** II-186 The removal of the old TSS turned a natural disaster (i.e., the 1989 earthquake) into a public good by opening up a new area of the city and allowing citizens to invest in its future promise. 11.5.1 A Rarely does a city get the chance to undo major urban planning blunders of the past. II-234 The renaissance of this historic part of our city should not be impeded or reversed by the construction of new freeway connectors in a residential neighborhood. The City of San Francisco does not need to return to the moribund era of massive highway projects of the 1950s and 1960s in order to achieve adequate traffic flow. Our vision should create more flexible, more efficient and simpler solutions for the future, such as substantially improving traffic flow by better/additional direction signs and better timing of traffic signals. II-268

11.8 **Of the remaining Alternatives, we support the recommendation of the Staff Technical Committee that is referred to in the Draft Environmental Impact Report on page 293 as the "DPT Variant."** As described, there would be no new off-ramps onto Second Street, nor any on-ramp over Second Street, with the DPT Variant alternative combining Alternative Four with (only) the expansion of the Fourth Street off-ramp as described in Alternatives Three and Five.

Please note that the Second Street Option of Alternatives Three and Five are particularly 11.4.2 A undesirable because they include the construction of a new off-ramp onto Second Stret and, II-208 in essence, directly into a 100+ car garage for the ClockTower Lofts and into what is now a residential neighborhood with substantial pedestrian traffic. Second Street is not only the best, but also the most attractive tree lined route from downtown into an area which includes two parks (South Park and South Beach Park, now under construction), a world

11.4.6 A renown art showcase (Capp Street Project), restaurants (Cava 555, South Park, Ecco, and The Fly Trap, to name a few), two large gyms (Gold's and 24 Hour Nautilis) and numerous clothing outlets and other retail stores. The construction of a Second Street off-ramp would only endangeer and inconvenience the growing flow of foot traffic to these destinations. II-223

11.4.4 A It should also be understood that the proposed Second Street off-ramp would be a comparatively short off-ramp with little lead cue room on the freeway (as opposed to the very long lead-in to the Fourth Street exit). This limited lead and ramping space would most certainly contribute to further Bay Bridge congestion and safety hazards, as traffic would be induced to take a new "Last SF Exit" which would frequently become backed up due to Second Street being clogged with its own congestion. II-216

11.4.3 C At this time, the positive impact of both a fully functional Highway 280 and an improved Embarcadero is still unknown. Furthermore, the extension of CalTrain into the downtown area is much more likely, and when completed, should greatly reduce pressure on our freeway system. II-213

11.5.1 A For the growing community of residents, citizens and visitors who walk the streets in the Rincon Hill neighborhood, the building of a Second Street off-ramp and a new massive concrete and steel on-ramp structure would be a tragic return to the monolithic, oppressive traffic control concepts of the past. While probably well-intentioned, the inclusion of the new Second Street off-ramp and Harrison Street on-ramp is flawed in its logic, would reverse the development gains made in the area, and reek havoc on this blossoming residential neighborhood. II-234

Do not sabotage the prescient planning work you have initiated and brilliantly accomplished in the South of Market area. Instead, please provide the vision to encourage our significant neighborhood to grow without the negative effects that rebuilding imposing freeway structures would cause.

Thank you for your consideration of our opinions on this issue.

Sincerely,

Eri Koga & Richard Berge

Badiner

RECEIVED
NOV 0 6 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

October 20, 1995

Honorable Sidney R. Unobskey
San Francisco, California

Re: The Proposed Transbay Terminal Separator Structure

Dear Honorable President Unoskey:

We are business owners in the Rincon Hill district of Sa
and are concerned about several of the proposed Termin
Structure (TSS) Alternatives:

11.4.2 A Alternatives Three and Five would be disastrous for our ne II-208
and would stall or reverse the development and beautificat
area. The Second Street option of Alternatives Three and
be especially damaging because it includes construction of
ramp which would exit into a T-intersection right in fron II-216
garage and onto what is already an extremely traffic clog
11.4.4 A The proposed Second Street off ramp would be comparatively
length with little cue room on the freeway (as opposed to
long lead in to the Fourth Street exit). This would cert
contribute to further Bay Bridge congestion as traffic wo
induced to take the new "Last S.F. Exit" and would becom
due to the high traffic congestion already apparent on Se II-186
11.1.3 C Furthermore, Second Street is not a good traffic artery in
downtown area. As for the Harrison Street on ramp, it woul II-208
11.4.2 B more south bound Hwy. 101 traffic into an area already con
East Bay bound traffic trying to get into the two Bay Bri
at Harrison and the top of First Street and Essex Street

Of the alternatives listed in the Environmental Impact Rep
support the DPT Variant (explained on page 293). As desc II-268
would be no new off ramps onto Second Street, nor any on
11.8 Second Street. Instead, the DPT Variant Alternative com
Alternative Four (improving signs, traffic lights, traf
with the expansion of the Fourth Street off ramp. II-234

Second Street is home to numerous residences, as well as
11.5.1 A restaurants, parks, retail stores and businesses, and an
on ramp would only endanger and inconvenience the growing
and car traffic to these destinations. It would impact c
of real estate in the area and would stifle any future gro
11.4.6 A improvements. Please consider the importance of fostering II-223
development of this area and support the "DPT Variant" Al
the Terminal Separator Structure.

Sincerely,

MARATHON REALTY MANAGEMENT LIMITED

Jonathan Matsoukis
Regional Property Manager

Carrie
Carrie Duke
Assistant Prop

SUE C. HESTOR
Attorney at Law
870 Market Street, Suite 1121
San Francisco, CA 94102
(415) 362-2778

October 23, 1995

Office of Environmental Review
Department of City Planning
1660 Mission Street
San Francisco CA 94103

RE: 92.202 E and 94.060 E · Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Strucuture DEIR/DEIS

To Whom it May Concern:

I am transmitting these comments on behalf of the Chinatown Resource Center, the Chinese Chamber of Commerce and Chinatown TRIP. They supplement other comments being submitted by others from those organizations.

Attached to these typed comments are hand-written pages in which I
analyzed a 10/94 memo by Jack Fleck which is the basis for the EIR II-200
determining that there were no traffic impacts from the loss of the ⟆
11.4.1 terminal separator and Embarcadero Freeway which required analysis II-208
or mitigation in this EIR. My comments start with that extremely
flawed "analysis" and set of assumptions.

(1) As is evident from the attached pages, the basic premise of Mr. Fleck's analysis is wrong-minded. He looked at a series of intersections and compared total traffic through those intersections before and after closure of the Freeway. (Throughout this paper I will use "Freeway" as a substitute for stating the Embarcadero Freeway and TSS.) That "analysis" ignores reality. While the Freeway was operational, much of the traffic headed for or leaving the Bay Bridge or Highway 101 so the south, used the east or west bound streets, in particular Clay, Washington and Broadway. Similarly they used Battery and Sansome to reach those ramps. Since the Freeway was demolished, the first entrance southbound -- southbound for all of the traffic originating or travelling through the area east of the Nob/Russian hills, financial district, Wharf, Chinatown, downtown and other northeast waterfront areas, is 4th Street. That street has as its northern extension Stockton Street. Thus, much traffic has been re-routed directly onto Chinatown streets, particularly Stockton Street southbound. In addition, others who normally would have travelled eastbound on Clay Street, now travel through Chinatown westbound on Sacramento and make a left turn onto Stockton. [Few people would voluntarily change their travel patterns to go further up Sacramento past Stockton because of

the extremely steep grade westbound.]

The paper by Mr. Fleck -- which appears to the key paper supporting the elimination of Chinatown as an area to be given careful analysis -- just adds up columns across the page.

My analysis does what we should have been done in the first place -- it looks at TRAFFIC FLOW. It is irrelevant that east-west traffic may have decreased overall if southbound traffic has gone substantially up. That is the stretch in gridlock. It feeds into 4th Street. It is also the route of the 30 Stockton bus, the route most heavily used for north-south MUNI service into Chinatown. It is also a line where busses are often over capacity and which don't allow people to get on at stops at Union Street and south because of that over-capacity sitution. That has been totally ignored.

Traffic which formerly used Bay Street on weekends, has also been diverted to Broadway -- and not just on weekends. Please look at the attached pages.

An honest attempt to understand Chinatown and North Beach would not allow the cursory "analysis" done for this EIR. It would instead do an analysis of how traffic FLOWS (or rather, doesn't flow.)

2. The second exceedingly poor part of this EIR -- one which indicates why the first problem wasn't caught -- is the lack of virtually all information on traffic flow in a graphic format. The users of this EIR are not just people who will plow through technical text and/or who are traffic engineers. II-264 11.7.2 Decision makers such as the Board of Supervisors and Commissions, should have information that their eyes and brains can readily absorb. That means graphics which explain.

The most obvious information that should be available is street diagrams which include direction of traffic flow. That is missing throughout. While everyone may know 4th is southbound, streets such as Beale, Drumm, Washington, may be confusing. All alternative summary diagrams should, at a minimum, have that information.

Second, there should be flow diagrams showing with those narrow, wider, and much wider arrows indicating volume, how traffic moved both before and after the Freeway removal. You need to do for yourselves, as well as the public, because people who drafted this document do not appear to have grasped the concept of traffic FLOW. Caltrans and the City must have information that show numbers of cars onto and off at the various exits, and onto and off the various feeder streets, e.g. how much traffic onto Broadway ramp from Broadway, how much from Sansome. How much on Clay Street ramp from Clay, how much down Battery? Then, provide similar maps/flow diagrams for current conditions, including your assumptions where you do not have exact measurements. Finally, most important, what projections have you made for each of those streets in the various alternatives.

Since you have eliminated Chinatown from your analysis, you will have to put back in Clay, Washington, Sacramento and Stockton, as well as Broadway past the area analyzed. [NOTE: The Primary and Secondary Study Area maps themselves should have indicated that you had a problem. In the primary study area you had a "complete" way to get to and from the Bay Bridge but only part of a system to get southbound on 101, since 4th Street ends at Market and traffic SOMEHOW needs to feed into it from the north -- the only traffic which can access Fourth via Harrison and Howard is that which comes down First (traffic would be travelling with Bridge approach traffic, and most reasonable people would try to avoid that), somehow connect via Montgomery (difficult), Second Street (generally difficult) or devious patterns to the east of Third.]

In summary, all of the main traffic graphics should be redone to provide traffic flow direction (at a minimum) and should be supplemented by easy to read traffic flow diagrams with arrows that an ordinary person could understand.

3. 11.7.2 Finally, in this regard, the diagrams of the street configurations (e.g. pp. 63 and 65) are much too tiny to understand. The direction arrows are so small as to be virtually unreadable. Blow those diagrams up (particularly the two lower ones) a low. II-264

4. 11.4.3 D Although these comments focus on Chinatown and North Beach, we must note that Hyde Street has also been totally ignored. Traffic heading for 101 to the east of Nob Hill has diverted through that residential area as well as through Chinatown, yet there is no analysis of that change. II-216

5. 11.1.1A There appears to have been a deflection in this EIS/EIR from the purpose of the study as set out in both the EIR at page 33 and in Caltrans 3/16/94 letter on that subject. In the Caltrans letter, they noted that the project which resulted from this process must be comparable in capacity and character to the previous (Freeway) facility. They also stated that the EIR must address improved traffic flow into Chinatown and North Beach/Fisherman's Wharf -- the areas which had deteriorated access, and in the case of Chinatown and North Beach increased traffic congestion. II-170

We are troubled that "restore local transportation connectivity lost by the Embarcadero Freeway and TSS" removal (p. 33) has been ignored as a goal when it comes to Chinatown/North Beach. In fact, in the paragraphs following the EIR states as a goal to, within northeast San Francisco, provide access to and from Downtown and Port waterside facilities.

In reading this report, it is hard to believe that any of the authors or primary consultants resides, has their office in or otherwise travels through on a regular (several times a week during rush hour and weekends) basis the area between Powell and Montgomery Street. If there are such people, we find it hard to believe that they have not experienced the shifts in traffic, the deterioration of Stockton Street, and the sense that neighborhood transportation is overwhelmed.

6. 11.7.2 To put it simply, the EIR states that the Embarcadero Freeway had 2500 peak hour cars southbound between Clay and Beale and 2500 peak hour cars northbound between Clay and Beale. Using simple graphics, what routes did those cars travel to get onto or off the Freeway on surface streets, what routes do they now take, what routes will they take under each alternative? II-264

7. 11.6.3 A The "economic and business characteristics" analysis is insulting and lacking in context. There is more than just an increase in travel time or 3 to 5 minutes involved. THE TRAFFIC HAS INCREASED ON THE SURFACE STREETS, PARTICULARLY ON STOCKTON AND PORTIONS OF BROADWAY AND SACRAMENTO. STOCKTON IS A NEIGHBORHOOD SHOPPING DISTRICT WITH THE MAJOR NORTH-SOUTH TRANSIT LINE SERVICE CHINATOWN. ALL OF THAT HAS DETERIORATED. Again, since you improperly eliminated analysis of Chinatown from the main traffic study, you have not looked at those issues. You must do so. II-259

8. 11.5.7 The assertion (page 364) that none of the proposed roadway and ramp features would run through minority or low-income neighborhoods, is similarly defective. The change in circulation patterns based on the current configuration of traffic flow, has had a negative impact on congestion in Chinatown. IT IS THAT CONGESTION, NOT JUST DETERIORATION IN NATIONAL ECONOMIC PATTERNS, THAT HAS AN AN ADVERSE CONSEQUENCE ON CHINATOWN AND NORTHBEACH. II-253

9. 11.3.3 The City appears to be improperly segmenting transportation projects and projects which have serious transportation/circulation impacts into different EIRs. In addition, prior to the conclusion of comments on this EIR the City released a Notice of Preparation for 95.212 Rincon Hill Sports and Entertainment Center. (10/6/95) That EIR contemplates a dramatic reconfiguration of Folsom Street between Beale and Spear (of necessity the area reconfigured will be more expansive than that to avoid a series of sharp turns. Use of that facility will also dramatically skew traffic demand in that area. II-196

10. 11.5.1B The nature of the adjacent uses and the "real" traffic capacity of the streets which took the before freeway closure and after freeway closure needs to be clearly set out and discussed. For example, traffic which used to flow up Sansome Street to Broadway travelled on streets with tow-aways and II-235

through generally an area developed with offices and other non-neighborhood commercial uses. Similarly on Battery, and lower Clay and Washington (below Montgomery and Columbus). Traffic which now goes down Stockton, or up Sacramento to Stockton from Montgomery Street. Those latter streets have much more constrained capacity, heavy MUNI service and area bounded by dense residential areas, neighborhood serving retail and Chinese community serving businesses. This is a dramatic change in where the traffic flows through, the other demands by transit, the nature of people on the street (many children and elderly residents vs. office workers), the type of loading from adjacent businesses (small retail which loads from the street v. large businesses with loading docks and just periodic loading).

11. We requested analysis AS PART OF THE PROEJCT NOT AS AN ADD-ON
MITIGATION MEASURE of measures to improve transit service to
and through Chinatown. The 30-Stockton serves children to and
from school, people travelling into and out of Chinatown, and
people coming to Chinatown to shop and leaving with bags of
goods. Service on the 30 through Chinatown (at least from
Union through the Stockton tunnel to Market) is severely
congested. It doesn't matter whether elsewhere on the 30 II-172
11.1.1B there is excess capacity, people can't get on the bus in that
stretch. We asked for additional transit service, via a loop
of the F line off the Embarcadero. It has been eliminated (a)
by the starting analysis by DPT which focussed on total
intersection use rather than traffic flow, (b) a memo by Peter
Straus of Muni, and (c) a memo by Rana Ahmadi. We have dealt
with (a) above.

Re Straus memo of 6/29/94. He compares the Embarcadero Center garage which was used for enhanced transit use improperly with the garage which we proposed. We agree that an intercept garage which requires people to traverse congested city streets does not result in that much better service. The garage location we proposed was designed to be immediately accessed from the freeway, without putting people onto city streets. He is also incorrect about the ability of people leaving Chinatown to readily connect to regional transit via the lines he sets out. The 30 and 15 travel on extremely congested streets. The 30 is already way over capacity in peak hours. It is hard to use for people carrying goods. Besides, the 15 does not connect to the Powell Street station. Finally, his "long range" plan is just too long range. Chinatown cannot wait 20 years for enhanced transit service. Capacity is the current constraint. We need additional capacity.

Re Ahmadi memo of 6/27/94. She ignores street congestion and emphasizes freeway congestion. It is not faster to drive on city streets when they are overloaded. She ignores, as does Straus, the increased incentive to use transit if there is a direct connection between the freeway/bridge exit and a garage with a direct transit linkage. She also ignores that our request was not a garage in itself, but a garage located so that there was a direct connection to light rail RIGHT THERE. The South of Market parking vacancy rate is irrelevant to our proposal. THIS IS SUPPOSED TO BE A PACKAGE PROPOSAL, GARAGE AND TRANSIT.

Basically, our parameters for the garage were totally disregarded. We don't want a garage that is in the middle of a surface street mess, but one which will get people out of their cars and onto dedicated transit lanes.

12. 11.1.1A Throughout this report there is lack of information on how the inclusion or non-inclusion of the Second Street ramp will affect traffic patterns north of Market, specifically through Chinatown. The information is focussed on South of Market. As is set out above, this is only part of the problem. II-170

13. 11.1.1C In conjunction with out F line loop proposal, we now reiterate that there must be an analysis of the reservation of transit loops off the Embarcadero and F line. We believe that the City would be extremely foolish and shortsighted if it did not look at the freeway right of ways both near Folsom, at Clay/Washington and Broadway as places to reserve permanent transit right of ways so that expanded light rail could serve Chinatown and North Beach. If it is infeasible to run an F line loop up Columbus past Broadway, a Washington/Broadway loop could be very feasible. But other roadway improvements AND LAND SALES should not be such that future addition of light rail would be precluded. Also, we believe that a loop to a garage near Folsom should be kept as an alternative future for MUNI, particularly if there is to be an arena near that site. Please analyze specifically maintenance of an adequate light rail right-of-way. II-174

This EIR needs some major revisions.

Sincerely,
Sue C Hestor
Sue C. Hestor
Attorney for Chinatown Resource Center
Chinese Chamber of Commerce
Chinatown TRIP

cc: above organizations

AM PEAK · TABLE B

BWY - EAST TO WEST ORDER FROM TOP

BWY / COLUMBUS

EB	1762 →	1933	↑	+10%
WB	991 →	525	↓↓	- 47%
SB	1016 →	771	↓↓	- 24%
NB	324 →	354	↑	+ 10%

BWY / STOCKTON

EB	1766 →	2049	↑↑	+16%
WB	701 →	470	↓↓	- 33%
SB	258 →	289	↑	+.12%
NB	134 →	129		STAT. IRRELEVANT

RIVER

STOCKTON - NORTH TO SOUTH FROM TOP

BWY / POWELL

EB	1657 →	2039	↑↑	+23%
WB	710 →	449	↓↓	-37%
SB	328 →	257	↓↓	- 22%
NB	305 →	224	↓↓	-27%

11.4.1A&B

II-200
~
II-208

STOCKTON / CLAY

EB	432 →	529	↑↑	+22%
WB	0	0		
SB	541 →	590	↑	+9%
NB	205 →	240	↑	+17%

STOCKTON / SACRAMENTO

EB	0	0		—
WB	550 →	270	↓↓	-51%
SB	577 →	728	↑↑	+26%
NB	241 →	175	↓↓	- 27%

①

WHAT TABLE "B" SHOWS

AM PEAK

① COUNTER-INTUITIVE INCREASE IN EASTBOUND TRAFFIC DOWN CLAY (RAMP HAS BEEN DEMOLISHED) AT STOCKTON:

EB STOCKTON/CLAY 432 → 529 +22%

② SUBSTANTIAL INCREASE IN SOUTHBOUND TRAFFIC ON STOCKTON BETWEEN CLAY + SACRAMENTO

CLAY 590
SACTO 728] + 138

- PRE EQ

CLAY 541
SACTO 577] + 36

REQUIRED CONCLUSION:

THAT TRAFFIC IS COMING EAST ON CLAY + TURNING RIGHT ONTO STOCKTON, PILING MORE CARS ONTO STOCKTON BETWEEN CLAY + SACRAMENTO

③ AT BROADWAY + COLUMBUS TRAFFIC of AREA TO N.W HAS SHIFTED SO THAT MORE EB ON BWY + LESS SB ON COLUMBUS

④ GENERALLY, A LOT MORE EB TRAFFIC ON BWY:

BWY / POWELL 1657 → 2039 +23%
BWY / STOCKTON 1766 → 2049 +16%
BWY / COLUMBUS 1762 → 1933 +10%

PM PEAK · TABLE C

BWY – EAST TO WEST ORDER FROM TOP

STOCKTON – NORTH TO SO. ORDER FROM TOP

BWY / COLUMBUS

EB	1003 → 774	↓↓	−23%		
WB	1959 → 1444	↓↓	−27%		
SB	495 → 566	↑	+14%		←
NB	817 → 735	↓	−10%		

BWY / STOCKTON

EB	1046 → 694	↓↓	−34%		
WB	1770 → 1229	↓↓	−31%		
SB	280 → 350	↑↑	+25%		←
NB	219 → 171	↓↓	−22%		

BWY / POWELL

EB	933 → 832	↓	−11%		
WB	1652 → 1310	↓↓	−21%		
SB	381 → 373		STAT. IRRELEVANT		
NB	380 → 382		STAT. IRRELEVANT		

STOCKTON / CLAY

EB	432 → 305	↓↓	−29%	NO LONGER FWY ENTRANCE	
WB	0 0		0		
SB	541 → 596	↑	10%		←
NB	205 → 214		STAT IRREL		

STOCKTON / SACTO

EB	0 0		0		
WB	550 → 518	↓	6%		
SB	577 → 644	↑	12%		←
NB	241 → 214	↓	11%		

WHAT TABLE "C" SHOWS   PM PEAK

① WB PATTERN SHOWS DIFFERENT TRAFFIC DISPERSAL PATTERN IN PM

	Pre EQ	POST EQ
COL	1959	1444
STOCK	1770	1229
POWELL	1652	1310

↓

traffic decreased as it goes further west - turns off to right or parks

traffic drops between Col & Stock, but goes up substantially bet Stock & Powell

WHY?

② BWY TRAFFIC DROPS AT COLUMBUS & STOCKTON IN ALL DIRECTIONS BUT SOUTHBOUND – WHAT THIS SHOWS IS NEW PATTERNS TO BRIDGE & FREEWAY - FROM EAST/WEST BROADWAY RAMP TO SOUTH TO 4th ST (VIA STOCKTON) & SOUTH TO BRIDGE APPROACHES VIA COLUMBUS

- NO INCREASE ON POWELL BECAUSE IRRELEVANT TO ACCESSE

③ ALL INCREASES ARE IN SOUTHBOUND DIRECTION - SHOWING CHANGED PATTERN ON STOCKTON STREET & COLUMBUS STREET BECAUSE OF SWITCH IN ACCESS TO BRIDGE & FWYS F E/W → N/S

④

WHAT TABLE "C" SHOWS (2

④ EB TRAFFIC ON BROADWAY HAS SUBSTANTIAL DROP BETWEEN POWELL & STOCKTON (832 → 694), PRESUMABLY MOSTLY DISPERSION TO SOUTH SINCE LEFT TURNS PROHIBITED

⑤

WHAT TABLE "D" SHOWS

WEEKEND

① NOTE: PRE-EQ WAS DONE IN AUGUST
POST-EQ WAS DONE IN JAN '94

HUGE INCREASE IN SOUTHBOUND TRAFFIC AT COLUMBUS + BROADWAY

314 → 601 + 91%

② IT IS REASONABLE, BASED ON INFO IN TABLES "C" + "B" + BASED ON OBSERVED TRAFFIC PATTERNS BY RESIDENTS OF CHINATOWN + NORTH BEACH, TO ASSUME A SUBSTANTIAL INCREASE TO HAVE SIMILARLY OCCURRED ON STOCKTON STREET

⑥

Chinatown

TRIP

Transportation
Research and
Improvement Project
1525 Grant Avenue
San Francisco
California 94133
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華埠交通改善會

Oct. 23, 1995

Barbara W. Sahm, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RE: Draft Environmental Impact Statement / Environmental Impact Report for the Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm,

On behalf of the Chinatown Transportation Research Improvement Project (TRIP), I am writing to voice our concerns that the current preferred alternative to the replacement of the Embarcadero Freeway will not adequately serve the needs of the Chinatown area in light of its regional importance.

11.1.1D It is inarguable that San Francisco's historic Chinatown district is not just a major San Francisco tourist attraction but also a major cultural and economic center for the San Francisco Bay Area's sizable Chinese-American populous. As such, it is important that San Francisco maintains, if not improve access to and from Chinatown. II-175

It is highly commendable that San Francisco has taken great strides to improve transit access within San Francisco to and from Chinatown with the implementation of the 83-Pacific line, the operation of articulated trolley coaches on the 30-Stockton on weekends, and the possibility of providing underground light rail service connecting Chinatown with Market Street and a possible Bayshore Corridor light rail line. However, it appears that San Francisco has not taken the same care and consideration in providing regional access to and from Chinatown given its importance to the sizable Chinese-American population.

Prior to the 1989 Loma Prieta earthquake, Chinatown, along with North Beach, had relatively direct access to the Bay Area's regional freeway network with the Embarcadero Freeway and the Terminal Separator. The freeway permitted the region's Chinese-Americans to frequent Chinatown for both cultural activities and shopping. The same freeway also facilitated Chinatown's businesses to serve the region's large Chinese-American community.

With the demolition of the Embarcadero Freeway and Terminal Separator after the Loma Prieta Earthquake, Chinatown has not had direct access to the Bay Area's extensive freeway network which it had enjoyed in the past. As a result of San Francisco's inability to muster much more than a relatively simple signing program, the region's Chinese-American population and businesses have been forced to endure increasingly serious traffic congestion on surface streets in SOMA, Downtown and the Financial District which separate Chinatown from the Bay Area's freeway network in order to partake in Chinatown's unique and significant cultural and economic activities. Given the increasing difficulty in

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11.4.1 11.6.3 A & B getting to Chinatown from throughout the Bay Area, it is not surprising that traffic volumes within Chinatown have declined somewhat as indicated by the San Francisco's Department of Parking and Traffic Report on Traffic Conditions in the Chinatown, North Beach, and Fisherman's Wharf Districts Before and After the 1989 Loma Prieta Earthquake. Not coincidentally, the increased difficulty of the region's Chinese-Americans to access San Francisco's Chinatown has resulted in less business by Chinatown's numerous but declining number of commercial establishments catering strictly to the region's Chinese-Americans. II-200 ~ II-208 II-259 II-260

11.4.1 In reviewing DPT Study, it was interesting to note that the report did not include any information directly measuring the increase (or decrease) in the average travel time it took to get from the Bay Area's freeway network (Interstate 80/U.S. 101) to Chinatown both before and after the earthquake. If such an analysis were included, it would more than likely show that travel times have increased substantially due to increased traffic congestion in the areas between Chinatown and the Bay Area freeway system. The analysis, if taken further, would probably show that the above mentioned report's recommendations for signal timing and controller changes would produce, at best, slight improvements in improving access between Chinatown and the region via the Bay Area's freeway network, and in no way would the recommendations reduce travel time between Chinatown and the Bay Area's regional freeway network. II-200 ~ II-208

11.1.1D In order to preserve the regional importance of San Francisco's Chinatown in the San Francisco Bay Area, as well as to improve Chinatown's economic climate, San Francisco must consider only those Embarcadero Freeway and Terminal Separator alternatives which will both improve traffic flows for the entire area and reduce travel times between Chinatown and the Bay Area's regional freeway system to that prior to the Loma Prieta earthquake. Unless this is done in order to bring the region's Chinese Americans back into San Francisco's Chinatown, it may be doomed to be just another tourist attraction and not the active and vibrant community as it should be. II-175

Sincerely,

Enid Ng Lim

Enid Lim
Chinatown TRIP

cc:
The Chinese Chamber of Commerce
The Chinatown Merchants Association
The Chinatown Resource Center

CHINATOWN RESOURCE CENTER 華埠改進協助社
1525 GRANT AVENUE SAN FRANCISCO CALIFORNIA 94133-3323 TEL 415 984-1454 FAX 415 362-7992

Oct. 23, 1995

Barbara W. Sahm, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

RE: **Draft Environmental Impact Statement/Environmental Impact Report Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure**

Dear Ms. Sahm,

The Chinatown Resource Center (CRC) respectfully submit the following comments for your consideration. Please note that the comments stated below are *in addition* to the letter being submitted by Sue Hestor on behalf of the Chinese Chamber of Commerce, the Chinatown Transportation Research and Improvement Project, and the CRC.

First and foremost, I would like to express our appreciation for the City's efforts to restore a transportation system so vital to all of our communities. The new Embarcadero Roadway, with the proposed mid-Embarcadero open space and other waterfront improvements, should prove to be of an added value to our great city. As you know, the Chinatown Resource Center participated in a number of these efforts, including a representation at the Mid-Embarcadero Open Space Citizens Advisory Committee. Chinatown, like other neighborhoods in the city, would likely be a beneficiary of the new roadway.

11.4.1 As you know before the Loma Prieta Earthquake, the Embarcadero Freeway provided a regional connection to Chinatown/North Beach and the Financial District via the on and off ramps at the Washington, the Clay and the Broadway corridors. The traffic that is currently on the surface streets was then carried on the elevated freeway and diverted to the northeast sector at the edge of Chinatown/North Beach. Chinatown was very much an integral part of this regional network. The Draft EIS/EIR, however, focuses on the waterfront and at the terminal separator area; it dismisses the regional importance of the northeast sector by not fully incorporating it in the study area for the roadway alternatives. Consequently, it did not adequately address the changed traffic patterns within Chinatown/North Beach and how each of the roadway alternatives have the potential to improve traffic flow into these communities. II-200 ⟆ II-208

The main difficulty that we now face with the Draft EIS/EIR is its lack of acknowledgment of a problem which we in the Chinatown community know exists. The Draft EIS/EIR concludes that the "traffic volumes and operation conditions (in the Secondary Study Area - the northeast sector) changed very little between pre-earthquake and existing conditions (Page 143)." As long time residents of and commuters into and out of Chinatown daily, we disagree with this premise. A major oversight on the analysis done is that it fails to recognize the change in the direction of the traffic flow, from a primarily an east-west direction before the earthquake to a north-south direction currently, impacting major traffic pattern changes on streets such as Stockton within Chinatown. The Department of Parking and Traffic study, which the Draft EIS/EIR refers to ("Traffic Conditions in Chinatown, North Beach, and Fisherman's Wharf Districts Before and After the 1989 Loma Prieta Earthquake"), included traffic volume studies at select intersections, but it did not include any information measuring the time of travel to and from the I-80/U.S. 101. If such an analysis were done and the traffic flow changes acknowledged, we would see that the travel times have significantly increased due to the increased traffic congestion on the surface streets leading to the freeway network.

Speaking on behalf of the CRC, I feel that at a minimum there must first be a recognition of the problem that exists; only then can we get to the relevant solutions for Chinatown. A comprehensive traffic study that we are now suggesting would show that we do have daily struggles with the increased traffic congestion as evidenced by such streets as Stockton, Clay and Sacramento both during peak and non-peak hours, we do experience a longer than a five minute delay of travel to get in and out of Chinatown, and we did lose the direct access to the Bay Area's freeway network, all of which make vulnerable the unique economic and cultural roles that our community plays. Therefore, we request that before the final EIS/EIR is completed, the City with the input of the communities involved do a thorough analysis of traffic flow in 1. Chinatown/North Beach, 2. Financial District and 3. Fisherman's Wharf. Traffic flow information should indicate changes in traffic volumes, the direction of traffic flows, and the time of travel to and from the I-80/U.S. 101 to those communities in the northeast sector.

We also request that the solutions for Chinatown, whether they be transit based or otherwise, be addressed as a part of the current EIS/EIR, not an after thought as a "mitigation" measure. The access to and from the northeast sector must be considered as an integral part of the "preferred roadway alternative" since the roadway replacement is not only a waterfront related project. We ask that the City further do an in-depth exploration of the ways in which congestion on Chinatown streets could be alleviated and how the Chinatown connections to the regional transportation network be improved. Summarily
dismissed answers to suggested "solutions," as have been given in the Draft EIS/EIR, II-170
11.1.1A belittle the importance of our community locally and regionally. Also, interim measures
such as signage and signalization changes are only short term solutions. An "effective connection that provides traffic flow and capacity *comparable* to that provided by the old Route 480" (Board of Supervisors Resolution No. 668-93: 8-12-93) is the type of long term solution that the City and our community collectively should seek. We ask for an open dialogue to begin such discussions.

Despite the optimism we have for the new Embarcadero Roadway, the CRC believes that none of the roadway alternatives presented in the Draft EIS/EIR, including the "preferred alternative," offer Chinatown a real, long term solution. We are disappointed by
the way the Draft EIS/EIR fails to address the needs of the Chinatown community, and to a II-175
11.1.1D large extent, the entire northeast sector of the city. Our hope is to see it corrected in the
final EIS/EIR. We request for 1. a thorough traffic flow analysis for the northeast sector communities, 2. a coordinated solution for Chinatown as a part of the "preferred roadway alternative" and 3. community input, expanded beyond the few organizations thus far involved to the larger Chinatown community, for both requests one and two.

We thank you for the opportunity to present our concerns and look forward to working with the city and its consultants in the next phase of the EIS/EIR for the Embarcadero Roadway/Terminal Separator Structure.

Sincerely,

Gordon Chin
Executive Director

cc:
Supervisor Kevin Shelley
The Board of Supervisors
Planning Commission
Art Commission
Redevelopment Commission
Parking and Traffic Commission
Recreation & Parks Commission
Port Commission
Public Transportation Commission
San Francisco County Transportation Authority
Mid-Embarcadero Open Space Citizens Advisory Committee (MEOS)
The Chinese Chamber of Commerce
The Chinatown Merchants Association
The Chinatown Transportation Research and Improvement Project (TRIP)
The San Francisco Planning and Urban Research Association (SPUR)

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City & County of S.F.
Dept. of City Planing

OCT 23 1995

OFFICE OF
ENVIRONMENTAL REVIEW

October 20, 1995

Ms Barbara W. Sahm:

I ask that any decision on the "Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure" be delayed because I believe the Draft Environmental Impact Statement/Report (DEIR/EIS) for the project is not sufficient or incomplete for a decision to be made.

11.4.1 Specifically, the DEIR/EIS had relied on a Department of Parking and Traffic (DPT) study titled "Report on Traffic Conditions in the Chinatown, North Beach, and Fisherman's Wharf Districts Before and After the 1989 Loma Prieta Earthquake". The purpose of this study was limited in scope and purpose, and it cannot be used as a sufficient study for the conclusions drawn by the DEIR/EIS. If anything, only superficial conclusions, and minimal at that, can be inferred by the DPT study. The study suggests that traffic volume has either remained relatively unchanged or have grown slightly. To follow on the study's suggestion, I suggest that traffic before the earthquake was frustrating. And if traffic volume has remained unchanged or increased, then I believe frustration has also either remained unchanged or increased. II-200 ~ II-208

11.1.1A On a personal level, I know that before the earthquake there were four streets motorists would use to reach either highway 280 or 101. They were Broadway, Clay, Battery, and Stockton. With two of the four access points gone: Broadway and Clay -- the eastbound flow have turned southbound. And the DPT study supports that observation. I and others have found that commute traffic have degraded on Battery, Montgomery, and Stockton. If the alternatives are to either do nothing or add more ramps around the same area where current ramps are, then I see no effect for traffic in the North Beach/Chinatown area. Thus, the DEIR/EIS have failed to solve or even address the traffic problem in the North Beach/Chinatown area. II-170 11.1.1D II-175

The DEIR/EIS needs to include adequate study on what could happen with the various alternatives, and the alternatives should include solutions to the traffic problem in the North Beach/Chinatown area. Even the DEIR/EIS seems to acknowledges this need on page 130 where it asks for additional study intersections in the secondary study area.

Thank you for your time in considering my comments. If you have any questions, you have my address and telephone number.

Respectfully,

Michael D. Mah

Michael D. Mah

CHINATOWN RESOURCE CENTER 華埠改進協助社
1525 GRANT AVENUE SAN FRANCISCO CALIFORNIA 94133-3323 TEL 415 984-1454 FAX 415 362-7992

RECEIVED AT CPC HEARING 10-12-95
RETURN TO COMMISSION SECRETARY
FOR CASE FILE, (AHMADI) (GITTLMAN)

October 12, 1995

To: Planning Commission
Art Commission
Redevelopment Commission
Parking and Traffic Commission
Recreation & Parks Commission
Port Commission
Public Transportation Commission
San Francisco County Transportation Authority

RE: Draft Environmental Impact Statement / Environmental Impact Report (Draft EIS/EIR) - Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Commissioners,

The Chinese Chamber of Commerce, the Chinatown Resource Center and the Chinatown Transportation Research Improvement Project request of your commission to not take a vote on a preferred alternative until sufficient time has passed for adequate public review.

11.7.4 Our three agencies have several issues with the Draft EIS/EIR. Firstly, we are angered by the way the City chose to quickly "rubber-stamp" their "preferred alternative" through to eight commissions and the Board of Supervisors Land Use and Housing Committee even before the public comment period ends. Furthermore we feel that even under normal circumstances, a public comment period of approximately one month is inadequate for a document of such breadth and importance. **II-267**

11.1.1B Secondly, we are insulted with how the City has addressed Chinatown's concerns in the Draft EIS/EIR. Under the document, in many cases, the City superficially evaluated and dismissed specific requests made by our groups. Of a document of almost 800 pages, less than 10 are devoted to specific concerns that we have expressed as being integral to the selection of a roadway alternative. From the beginning, we saw a need to get beyond choosing a roadway/ramping configuration and get to how efficiently and with minimal environmental damage restore our seriously damaged transportation network. To reach that end, we formally requested specific mitigation measures to be explored and considered as a part cf the EIS/EIR. What we have now is a document that doesn't sufficiently address even those few that we have suggested. As an example, we would like to call your attention to page 113 of the document under which the City addresses one of our suggested mitigation measures - an idea of an intercept garage with a possible shuttle bus system and/or with a connection to a lightrail line. This idea was quickly dismissed mainly based on a single interdepartmental memo that was passed along from one planner to the next. There clearly was no other research done, either with the community and/or with other transportation related agencies. **II-172**

Lastly, our three groups feel strongly that the larger issue of mitigation to the entire northeast sector (Chinatown, North Beach and Fisherman's Wharf) must be addressed now, as a part of this EIS/EIR process and not to be overlooked again or passed on as an issue to be considered later. A

number of resolutions have been passed by the Board of Supervisors since 1990 specifically
stating that the City "recognizes the economic dependence of the Northeastern Businesses
District...and their need for a timely and effective connection that provides traffic flow and capacity
11.1.1A comparable to that provided by the old Route 480 between I-80 and the Embarcadero Roadway" II-170
(Resolution No. 668-93 adopted by the Board of Supervisors, August 23, 1993). Yet to this date,
aside from small interim measures such as signage and signalization changes, nothing significant
has been done to give our communities a comparable substitute for the lost freeway connection.

The Chinese Chamber, the Chinatown Resource Center and the Chinatown Transportation
Research Improvement Project urge that you give careful consideration to the issues presented to II-267
11.7.4 you before a decision is made. Please do not dismiss an entire northeast region of San Francisco
as being irrelevant to the regional transportation network; a cursory glance given in the Draft II-200
11.4.1 EIS/EIR is not enough. At a minimum we ask that sufficient time be allowed for a proper
digestion of the materials already presented. II-208

Thank you for your attention.

Sincerely,

Rose Pak
Rose Pak
General Consultant
Chinese Chamber of Commerce

Enid Ng Lim
Enid Ng Lim
Chinatown Transportation
Research Improvement Project

Gordon Chin
Executive Director
Chinatown Resource Center

cc:
Land Use and Housing Committee of the Board of Supervisors
Board of Supervisors

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OCT 3 1 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

OCTOBER 20, 1995

BARBARA SAHM
ENVIRONMENTAL REVIEW OFFICER
SAN FRANCISCO PLANNING COMMISSION
6160 MISSION STREET
SAN FRANCISCO, CALIFORNIA 94103

REF: DRAFT EIS EIR FOR
REPLACEMENT OF THE EMBARCADERO FREEWAY

Dear Ms. Sahm:

Three generations of our family have owned and operated
11.1.1D businesses in Chinatown since 1954. The Draft EIS EIR presented II-175
for the Embarcadero roadway ignores the interests and concerns of
Chinatown. Inadequate consideration has been given to our needs.

Since demolition of the Embarcadero Freeway, our business has
dropped by 40%-50%. We rely heavily on trucking companies to pick
up and deliver merchandise from Chinatown. Please note that our
main office is on Washington Street, which was previously served by
a large off-ramp from the Embarcadero Freeway. Although traffic
was heavy before, at least there was freeway access from Broadway
and Washington. Now, we are "landlocked" and many of the large
11.6.3 trucking companies refuse to serve Chinatown, citing "lack of II-259
A & B accessibility" and saying that it was "a waste of time". Truckers II-260
have told us that it takes them anywhere from 45 minutes to 1-1/2
11.4.1 hours more since the freeway was demolished. Costs have gone up II-202
and "redlining" by some truckers greatly restricts our ability to
do business.

As San Franciscans, it is embarrassing when our customers are
11.1.1A told by common carriers that Chinatown is "not accessible" for pick II-170
up and delivery of merchandise. After all, this is supposed to be
a city of international stature. Chinatown is a living community,
not some isolated cultural artifact. To survive, many Chinatown
businesses have moved to outlying areas such as Oakland and San
Jose. We do not want to be forced to "take our business
elsewhere", although one planner has suggested that our type of
business (non-tourist) was "inappropriate for the area".

Please revise your plans to give us access to the roads and
infrastructure that our taxes pay for.

Very truly yours,

Michael Y. Chung

THE LARGEST HOUSE OF GINSENG, ROYAL JELLY,
ORIENTAL HERBS, AND HERBAL PRODUCTS

寶讌昌

WARNER H. SCHMALZ A.I.A.
Architect

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City & County of S.F.
Dept. of City Planing

OCT 04 1995

OFFICE OF
ENVIRONMENTAL REVIEW

September 28, 1995

Ms. Barbara Sahm
Environmental Review Officer
Department of City Planning
1660 Mission Street
San Francisco, Calif. 94103

Re: Draft EIR/EIS
Alternatives to Replacement of the Embarcadero Freeway and the
Terminal Separator Structure

Dear Ms.Sahm:

Our office has reviewed the Draft Document and we would like to offer some observations and make recommendations regarding the detail of the report. As you may recall our office is working on behalf of the Ray Corporation, a property owner on Fremont Street south of the Transbay Terminal site. Our interest focuses principally on the area called the Transbay District Study Area and the impact the proposed Terminal Separator structure (TSS) replacement program will have on the ultimate planning in this area of the city.

11.1.3A II-184 Our initial comments are directed toward the Project Description (pg.1) which outlines the purpose of the report. For a project of this size and overall impact the general goals of the study seem very modest, i.e. to "restore... connectivity" and " enhance the integration of different modes of transportation" etc. One of the overall objectives not stated in the preamble should be to *"create a new traffic and transit infrastructure which will stimulate the orderly growth and development of the largest portion of underdeveloped C-3-O land in downtown San Francisco"* while maintaining and improving the urban quality of adjacent developed land areas in the city.

While it is understandable that the initial motivation of the EIR itself is to define a replacement program for structures damaged by the earthquake, the enormity of the opportunity to professionally analyze and redefine how the city can grow into this district using the replacement programs, should be an equally important and compelling objective of this study. The on-going Redevelopment Plan notwithstanding, the list of technical Alternatives studied in the EIR/EIS should be expanded to include more creative, long-range traffic and transit planning concepts.

The following additional goals should be added to the original four described on page one.

11.4.4B II-218 1. *"A more equal distribution of traffic on the Bay Bridge on and off ramps, existing and proposed, should be achieved in order to better balance and distribute peak hour traffic on the surface streets of the downtown area adjacent to the Bridge."*

The Draft Document does not contain an analysis of the distribution of traffic on the Bridge itself, especially eastbound peak hour. An analysis of the present and future capacity of the five eastbound lanes and on-ramps would contribute to understanding how to more evenly distribute street traffic accessing these ramps and how to reduce queuing on adjacent city streets.

The LOS on major downtown arterials, taking into consideration mitigation measures, is

unacceptably high on Battery/Bush/First streets and Harrison Street under all Alternatives. II-213
11.4.3 C Congestion on these streets has historically been high, causing significant blight which should be
eliminated under all proposed Alternatives. This seems to be because the northern most on-ramp
called First Street is overutilized under all Alternatives, and the Essex Street/Transbay Terminal
second lane ramp is generally underutilized.

The designation of the Essex street on-ramp as an HOV lane should be tested as a normal II-182
lane carrying full traffic capacity. Eastbound peak hour HOV lanes have historically carried low
11.1.2F traffic volumes. A study should be conducted to compare HOV total trips with comparable traffic
volumes as a non-HOV lane. The apparent benefit to have an HOV lane may not be worth the
additional queuing caused on adjacent streets to compensate for this apparent incentive

The "transit first" policy of the city should not penalize commuters and non-commuters
alike whose automobiles are already in the city. A more proper policy would be to restrict auto
traffic into the city by raising bridge tolls on the Oakland side of the Bridge. Once commuter cars II-184
11.1.3A are in the city the most enlightened policy is to get them back out as rapidly as possible with the
minimum queuing on outbound city streets.

2. *"Traffic flows on city streets should be clearly divided between Eastbound destinations and Westbound/Peninsula destinations to provide more even flows on city streets."*

Alternatives 3 and 5 which include a new westbound on-ramp at Second Street will
produce major new congestion by creating merged east and west bound traffic on Harrison Street
between the Embarcadero and First Street at the P.M. commute. This will produce an artificially
poor LOS on Harrison Street as east and west bound traffic compete for capacity on a street which
is already the major victim of normal incident conditions on the Bridge, and a poor LOS extending
11.4.3 C north back along the Embarcadero. II-213

A proposal made as part of the Ray Plan in 1993 was to divide eastbound traffic from westbound traffic by utilizing only the Fourth Street on-ramps and the new King Street on-ramps for Peninsula traffic and eliminating any build back of Peninsula and westbound ramps in the area east of Fourth Street. This clear division of east and west bound traffic would eliminate congestion on those surface streets such as Harrison Street which would suffer from unnecessary competition for lane space between east and west bound traffic, and the inefficiency of merged traffic shifting lanes in already congested conditions.

To further analyze the benefits of separating Peninsula/westbound traffic from eastbound
traffic a study should be made of the improvement in the LOS which would result in all the
Alternatives with the expansion of lane capacity on the Embarcadero from Howard to Harrison
from two lanes to three lanes in the southbound direction. The recent completion of this roadway II-183
11.1.2 I with only two moving lanes and one right turn lane onto Harrison Street has created major daily
P.M. commuter congestion along the Embarcadero during normal as well as incident conditions.
Regardless of how Peninsula/westbound traffic is distributed, this study will illustrate how
unacceptable queuing along the waterfront can be reduced by minor improvements in the lane
capacity of the Embarcadero.

3. *"The clear separation of commuter auto traffic and public transit onto traffic priority* II-189
11.1.3 F *streets and transit priority streets will alleviate unnecessary congestion and peak hour queuing on
major downtown arterials."*

The P.M. commute level of service on First Street continues to be unacceptably high under all alternatives. Taking into consideration the high frequency of incident conditions which have historically been the normal condition along this corridor (pg.9), even with mitigation the congestion which will continue on First Street from Market/Bush/Battery south to Harrison remains a major obstacle to good traffic flow and good urban design in the center of the downtown. Depending upon restriping First to create another traffic lane does not address the real problem. A more creative, long term solution should be studied. II-178

11.1.2 C An analysis should be made of the positive impacts on the LOS resulting from significantly reducing Muni traffic and turning movements in front of the Transbay Terminal on both First and Fremont to Market Street. This historic competition for use of these two streets between buses, trolleys and autos is a major contributor to the bottleneck which has long characterized these streets. II-129

Because there is a need to relocate the obsolete TTT from its present location to a more suitable site at Howard between Main and Beale, the opportunity exists to study two important alternatives which will reduce this congestion. By generally restricting Muni movements to a continuous loop servicing Mission and Market, major reductions can be made in traffic/transit conflicts on First and Fremont. Utilizing a transit network bus system on city streets originally proposed as a part of the 1993 Ray Plan, city and commuter buses can be segregated from commuter traffic with a resultant increase in flow capacity.

Another alternative which should be studied is utilizing Essex Street from Howard to Harrison as a major reservoir for P.M. eastbound commuter queuing directly accessing the second lane of the Bay Bridge. By analyzing eastbound traffic flows to the Bridge using Essex as a restricted access ramp/R.O.W. and grade separating Essex from Folsom and Howard, a permanent, high capacity commuter queue could be designed which would not contribute to the congestion on city streets. This concept was dismissed prior to developing the final list of alternatives in this HEIR (pg.112) as too expensive. However given the unacceptable LOS and the predictable frequency of congestion from incident conditions on the Bridge, a plan which provides high queuing capacity without restricting non-commuter traffic on city streets should be re-evaluated.

11.1.2D I would like to offer several other comments which address other design issues in the report. Alternatives 3 and 5 study the construction of a new off-ramp at Fremont Street connecting to Folsom. We support this concept as a way of better distributing A.M. commuter traffic. However a variation on this concept is to bring an off ramp down on the south side of Folsom at First with a free traffic flow to Fremont Street by closing First to the Bay Bridge for local traffic only. Combined with the proposed Essex Street on ramp discussed above, First Street can be closed to bridge traffic thus distributing a major portion of traffic to the second lane of the bridge. This off ramp concept was not included in the alternatives to be studied, but our analysis has shown that the Cal Trans gradient criteria of 8% maximum can be achieved. II-179

11.5 .1 D The discussion on growth and employment in Section 4 suggests that because no new significant projects have been identified for this district at this time, no provision should be made for increased commuter traffic in the district due to future growth in employment. This is not a supportable conclusion. Reasonable estimates of commercial growth to the year 2015 based on current C-3-0 zoning should be included in this EIR. Recent no-growth patterns of 1990-1995 should not be used as the normal pattern of economic activity for the next 20 years in the city's downtown. II-236

11.1.1 B The discussion on of commuter intercept parking with shuttle service to remote locations in the downtown (pg.113) concludes that this concept will have little positive impact on the city's traffic patterns. Assuming even modest growth in downtown employment in the next 20 years and assuming a high portion of that growth will occur in this underdeveloped district, a commuter intercept parking plan for workers who walk to work, however, is a viable concept. As a part of the Ray Plan anticipated growth in employment resulting in more commuter trips to the city can be mitigated and that growth supported by the planning for underground parking in the area bound by Main, Folsom, Essex and Mission. This area can be served directly from the bridge without introducing unnecessary commuter traffic onto city streets. The planning policies of the city should incorporate this concept as a positive method to support new economic activity in the downtown. II-172

11.3.3 II-196 On pages 305-8 a brief discussion of the proposed arena at Folsom and Main indicates that significant traffic impacts can be anticipated, but that a definitive study in a future EIR will analyze the problem in detail. The negative impact on district traffic and urban design of placing a new arena on this site will be very great. If the preliminary conclusion that 70 % of all arena attendees will arrive by auto for evening events is correct as stated in the EIR, the congestion in this area will be unacceptably high. Any perceived advantage of placing a multi-purpose arena in the downtown close to public transit will be largely offset by the high portion of auto-oriented attendees who use the facility. With this site traffic considerations and land use conflicts with the emerging residential neighborhood on Ricon Hill will be a major factor legislating against the viability of this site.

11.3.6 II-199 The omission of a study of the traffic and transit impacts of relocating the Transbay terminal leaves a major void in the comprehensiveness of this E.I.R. 11.1.3A As this portion of the downtown infrastructure puzzle is studied in greater detail in the current Redevelopment Plan , the opportunity to take a bigger view of these complex transportation issues must be fully explored. II-184

Thank you in advance for your consideration.

Very truly,

Warner H. Schmalz, A.I.A.
Architect

SAN FRANCISCO
Tomorrow
An Urban Environmental Organization

OUR 25TH YEAR

October 12, 1995

City Planning Commission
401 Van Ness Avenue
San Francisco, CA 94102

Re: Selection of Preferred Alternative:
Embarcadero Roadway/Terminal Separator,
(2.202E and 94.060E)

Dear Commissioners:

San Francisco Tomorrow is greatly concerned that the selection of a preferred II-267
alternative at your hearing today may preclude selection of the best alternative when the
Final Environmental Impact Report is published in Spring 1996. We understand that the
11.7.4 Federal environmental process (NEPA) "requires" you to make known a preference at this
time. However, we hope that you will make it abundantly clear that the selection that you
make at this time is not informed by the full data which will be available at the Final EIR
publication.

We at San Francisco Tomorrow will be awaiting the publication of the final EIR
before making our selection. Thus, we cannot persuade you of our choice at this time. All
that we can do is say that none of the alternatives published in the Draft EIR fully satisfies II-268
our criteria for the Embarcadero Roadway (freeway) replacement. We are very curious to
11.8 learn more about the pedestrian separated design presented at the DEIR hearing by Mario
Ciampi, which will be evaluated by the engineers and cost accountants at Department of
Public Works ao that feasibility figures may be available for the decisionmakers in the
Spring. The Ciampi scheme is an appealing one, however, since it appears to fulfill the
criteria of the Master Plan regarding pedestrian safety, amenity and convenience that San II-175
11.1.2A Francisco Tomorrow urges be implemented, namely:

1. Mitigate and reduce the impacts of automobile traffic in and around parks and along shoreline recreation areas. (Policy 18.5, Transportation Element)

2. Intercept and divert as much automobile traffic as feasible away from the water's edge and areas of intense pedestrian activity in order to make conditions more pleasurable, safe and interesting for the pedestrian, and in order to facilitate the commercial and recreational development of the area. (Policy 8.1, Northeatern Waterfront Element)

3. Facilitate pedestrian access to the shoreline, including access for the handicapped, through the provision of convenient, safe pedestrian crossings along the Embarcadero. (Policy 8.7, Northeastern Waterfront Element)

We urge that you condition your endorsement of an alternative upon the publication II-267
of the Final EIR. Or better yet, decline to select an alternative and make your decision to
11.7.4 await the facts which will be available in the Final EIR known in a letter to the Board of
Supervisors.

Sincerely yours,

Jennifer Clary, President

54 Mint Street, Suite 310 • San Francisco, CA 94103-1815 • (415) 566-7050

Printed on recycled paper.

Steuart Street Association

c/o John Buss, at Bunje, Buss & Lloyd 188 The Embarcadero, Suite 500, San Francisco, CA 94105
Tel: (415) 979 2318 Fax: (415) 394 5600

City & County of S.F.
Dept. of City Planing

OCT 1 1 1995

OFFICE OF
ENVIRONMENTAL REVIEW

October 9, 1995

Barbara W. Sahm, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm:

The Steuart Street Association is comprised of all the owners and many of the principal tenants of the City block bounded by The Embarcadero and Howard, Steuart and Mission Streets. The members of the Association include The Embarcadero YMCA, The Jewish Community Federation, The Boulevard and Harry Denton's restaurants, The Harbor Court and Griffin hotels. (Please see the enclosed list for a complete membership).

The Association last met on October 5, 1995 in part to review the Draft EIS/EIR and to discuss the alternatives.

The Association has requested that I write to you so that its views can be transmitted to the City Planning Commission and all the other reviewing and approving bodies.

The Association believes that the EIS/EIR very thoroughly documents the potential impacts of the implementation of the alternatives and commends all those staff persons and consultants involved in the preparation for a most readable and understandable document. The Association is impressed by the minimal number of inaccuracies and feels that a most complex subject has been presented in a remarkably clear manner.

11.8 **The Association strongly supports Alternative Three.** We urge that the appropriate City, State and Federal Government departments and officials now work diligently and efficiently to bring the implementation of this alternative to closure. II-268

The Association is particularly gratified to learn (page 294) that during construction there will adequate space within the The Embarcadero right-of-way between Folsom Street and Broadway to permit the staging of construction while maintaining three traffic lanes in each direction of travel. Steuart Street, between Mission and Folsom Streets, is presently a dangerous nightmare due to the rerouting of southbound Embarcadero traffic while the Muni-Metro Turnback project is under construction. Members of the Association look forward to a return to normality on one side of its block at least in September, 1996 with the conclusion of this project's construction.

It is important for the economic and social well-being of this City that The Embarcadero improvements be completed as quickly as practical. We have all been operating these past six years under a severe handicap with disrupted patterns of traffic and the results of various construction and demolition projects. It is time to complete the rebuilding of the central section of The Embarcadero which has been so dramatically improved to the north and south over the past year or so.

The debate over the replacement of the Embarcadero Freeway has already taken too long. The Steuart Street Association urges that the remaining process be concluded efficiently and the contract for the replacement project be awarded as quickly as possible. It is time for action. No more delays please.

We would like to be kept fully informed of the continuing public approval process and also be on the mailing list to receive a copy of the Final EIS/EIR when it is published.

Thank you for your consideration of the Steuart Street Association's position.

Sincerely yours,

Steuart Street Association

By: John Buss, APA, AICP

Enclosure as stated

cc: All members of the Steuart Street Association

Rebecca Kohlstand -- Project Manager, Waterfront Transportation Projects
Michael I. Kaplan -- San Francisco Redevelopment Agency
Joe Wyman -- Port of San Francisco
Deborah Learner/Joanne Wilson -- San Francisco Recreation and Park Department
Denise Brady -- San Francisco Department of Public Works
Jack Fleck -- San Francisco Department of Parking and Traffic
Peter Staus -- MUNI/SFPTC
David Sutter -- Utilities Engineering Bureau, City and County of San Francisco

JB:bj

c:\word\bbl\jwaxdc\sahm.1

Steuart Street Association (and related parties)

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c\word\bbl\jwaxdc\ssaadds.1 revised October 9, 1995

SIERRA CLUB
SAN FRANCISCO GROUP
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Please reply to:
Howard Strassner
419 Vicente, 661-8786
San Francisco Ca, 94116
October 13, 1995

Re: Comments to DEIR Alternatives to Replacement of Embarcadero Freeway and Terminal Separator

RECEIVED
OCT 1 6 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Barbara Sahm, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Dear Ms. Sahm,

The Sierra Club has the following comments to the subject DEIR:

1) Page 377 refers to Federal right-of-way rules for compensation for
the Port's revenue loss due to parking displacement. Does this rule apply to
public entities? Does the public have to compensate other parts of the public
for a loss due to the creation of a public benefit? Appendix A-4 estimates
that an underground garage would cost $25 to 35 million for 340 cars and these
costs are correctly not included in total cost estimates. Section 3.3.3
11.6.2 correctly shows the minor overall nature of the loss of parking spaces. II-258
Section 4.4.7 should have mentioned the estimated cost of $100,000 to
construct a single parking space under Block 202 as a economic difficulty in
addition to the political difficulties. This Section should also mention the
political difficulty experienced by the recent proposal to spend only one
third as much for additional parking spaces under Civic Center Park, when San
Francisco voters refused fund new garage construction.

2) Page 353 discusses pedestrian crossing of the Embarcadero Roadway at II-227
a pace of 4 feet per sec. The Parking and Traffic Department is methodically
working to provide the signal changes which will allow pedestrians who can
11.4.6B only walk at a pace of 2.5 feet per second opportunity to cross existing busy
streets in safety. New streets should start operation with this improved
standard. All crossing times should be recalculated based on this safer
standard. Additional time should be allowed for late starting pedestrians who
have to que in "larger pulses" and where left turn lanes are provided.

3) Appendix A-4 states an assumption, with no support, that Federal and
State Emergency Relief Funds would not be available for Alternate 4. This is
difficult to except since the LOS studies indicate that Alternative 4 operates II-192
11.2F as well as any of the more expensive Alternates. This assumption should be
explained in more detail or the Federal ER portion of funding should be
corrected to cover more of the Estimated Cost of the Embarcadero Portion,
similar to the other Alternatives.

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4) Section 4.5.1 has some serious defects:

a) The EIR reports that AM traffic has decreased by about 18% in about four years and that downtown jobs have almost decreased. The EIR, elsewhere correctly shows that little of this decrease was due to the earthquake. However the EIR still uses ABAG projections of 16% of downtown employment to induce an 18% increase in traffic even after a small modal shift to transit. The EIR acknowledges that this increase may be "aggressive".

b) The Alternatives show only a minor modal shift from auto to transit.
The EIR discounts completely major plans to improve transit in the Geary and
Third Street Corridors, even though partial funding is already available. The
EIR includes an allowance for traffic to an from a garage for which there is
no funding available and discusses at length traffic to an arena, and a sports
11.4.3C complex which is speculative at best. The traffic increase is shown with no II-213
demonstration that there will be any construction of new garages to accommodate the traffic.

c) The EIR does not include a mention of a modal shift from auto to walking and bicycle use even though the project area is being surrounded by large residential areas.

d) In 1994 RAFT performed a study using MTC computers and methodology which showed that: building almost no new freeways, using most available transportation funds for transit and aligning most residential and commercial uses with the transit, greatly reduced automobile congestion. The EIR agreed with this study when it correctly showed that the alternatives with the least freeway ramps had less street congestion.

e) The time has come for EIRs to project traffic based on a "Transit First" analysis using: reasonable expected employment increases modified by greater use of home work sites, aggressive projections of transit use, higher parking fees and cash back instead of free parking for employees, and a modal shift toward walking and bicycling. These "Transit First" projections should be printed in parallel with the tables included in Section 4.5.

Very truly yours,

Howard Strassner

Howard Strassner, Chair
Transportation Committee

SAN FRANCISCO
Tomorrow
An Urban Environmental Organization
OUR 25TH YEAR

October 20, 1995

Barbara W. Sahm
Environmental Review Office
San Francisco Planning Dept.
1660 Mission St.
San Francisco, CA 94103

Subj.: DEIS/EIR 92.202.E & 94.060E : Alternatives to the Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm:

Attached are San Francisco Tomorrow's comments on subject DEIS/EIR.

Sincerely yours

Jennifer Clary

Jennifer Clary, President

City & County of S.F.
Dept. of City Planing

OCT 23 1995

OFFICE OF
ENVIRONMENTAL REVIEW

54 Mint Street, Suite 310 • San Francisco, CA 94103-1815 • (415) 566-7050

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SAN FRANCISCO
Tomorrow
An Urban Environmental Organization
OUR 25TH YEAR

October 20, 1995

COMMENTS ON THE EIS/EIR ON ALTERNATIVES TO REPLACEMENT OF THE EMBARCADERO FREEWAY AND THE TERMINAL SEPARATOR STRUCTURE

San Francisco Tomorrow(SFT) has problems with process. City departments are selecting a preferred alternative before the close of the
11.7.4 public comment period, that is, before seeing all public comment II-267
and the responses thereto. And to compound the injustice to the public, are selecting one that has not received as thorough an analysis as the other alternatives discussed in subject EIS/EIR.

SFT wishes to remind all concerned that the policy of San Francisco
is Transit First. No alternative should be selected that will II-194
cause delays to or interference with transit. No alternative should
11.2H be selected until it is certain that it is consistent with the city's
Transit First Policy. Question: who determines if an alternative complies with the city's Transit First Policy? Should the City Attorney give an opinion on this?

Alternatives 3 and 5 propose new freeway ramps at Second St. and/or Fourth St. These ramps cause problems for transit.

Muni has three trunk lines on Fourth St. These now suffer from congestion caused by the backup on Fourth St. of automobiles trying to get on the freeway. Nothing should be done that will increase traffic on Fourth St. and cause further delays to Muni, and these ramps will do that.

Muni has one trunk line on Second St. Studies are now underway of alternate routings for a light rail line in the Bayshore Corridor.
One possible alternative could put LRV's on Second St. Nothing II-221
11.4.5C should be done that would put more traffic on Second St. and
potentially cause delays to transit. These ramps will do that.

Note that on page 245 it states that alternatives 3 and 5 create "slightly" worse peak hour congestion on Forst and Fourth Sts. These are important Muni Streets and additional congestion should not be tolerated on them. Table 4.5-2 shows that these alternatives make conditions at Battery and Bush Sts. worse than other alternatives. This intersection is already a bottleneck that causes serious delays to three Muni lines. Nothing should be done that would worsen this situation.

-continued-

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11.8 It is very interesting to learn from this EIS/EIR that in looking at the overall picture, traffic on city streets seems to flow best with Alternative 2 - i.e., traffic speeds and intersection performance are generally better than under other alternatives, and it has the least negative impact on transit. II-268

11.2F&G It has been stated that Federal Emergency Relief (ER) funds would not be available for this alternative. This leads to two possible scenarios. In one, Alternative 1, the No-Build, would be the one that happens. This would not be the end of the world. The F-Line will be built through the Central Embarcadero area anyway, since its funding is coming from separate sources. SFT feels that under these circumstances the money will materialize somehow. Which leads us to Scenario Two: city officials work with our congressional delegation and any others necessary to make ER funds available for Alternative Two. II-192 II-193

11.6.2 San Francisco Tomorrow opposes the construction of a garage for the Port in this project area. It is inappropriate to put one in an area where the principal access should be by transit. Attention is drawn to the last sentence in the second paragraph on page 344: "Over the last 20-25 years, San Francisco employment has increased faster than the parking supply, shifts to transit have occurred, and regional air quality has improved." Not building this garage will improve air quality and reduce traffic in this area. If the Port feels it needs more revenue, it should look to maritime or compatible industrial uses on its property. For example, the Muni's new LRV's are being assembled on Port property; the Caltrain cars were assembled on Port property. II-258

11.3.4 The Muni Ferry Bus Terminal is incorrectly referred to throughout this EIS/EIR. It is not a "layover" or a "bus parking lot". It is a terminal. Many functions take place at a terminal, layover is only one of them. Places in this EIS/EIR where it should be changed to refer to this important facility by its correct name - Muni Ferry Bus Terminal - include: II-198

page 13 - 1st sentence of the next to last paragraph
page 92 - 2nd subheading and 1st sentence of the last paragraph
page 122 - 1st sentence of the 2nd paragraph
page 217 - bullet no. 3
page 305 - 2nd sentence of the 2nd paragraph
page 316 - 1st sentence of the 3rd paragraph
page 332 - 1st and last sentences of the 2nd and 3rd paragraphs
    after the bullets
page 376 - last sentence on the page

The name should also be corrected in any other place it is incorrectly referred to.

11.4.5C The description of the transit lanes on First and Fremont Sts. (pages 62-65 and 331-332) raises questions. The relative locations of the street car track and the loading zone on Fremont St. at Market St. preclude use of the islad by street car passengers. The movable transit lane on First St. raises questions since there is a street car track on that street. How would it be moved? It should be noted that a study is now underway for light rail in the Geary Corridor, and some alternatives under study might use surface tracks to Transbay Terminal. II-221

- continued-

It should be noted that the F-Line now operates daily from early morning to late night (see page 151).

The figures given for the lengths of blocks on pages 131-132 are II-265
not correct. North of Market St. the north-south blocks are
11.7.3 275 ft. between property lines and the east-west blocks are either
275 ft. or 412 ft. 6 inches between property lines. South of
Market St. the north-south blocks are 550 ft. between property lines
and the east-west blocks are either 275 ft. or 825 ft. between
property lines.

In the description of transit services in Section 4, it should be
noted on page 317 that the Transbay Terminal site is also being
studied as a possible terminal for the Caltrain downtown extension. II-195
The 2nd senetnce of the last paragraph on this page should be
11.3.1 revised to read "Various locations for this downtown station are
being considered, including a Beale Street location currenly
favored by the City and the Caltrain Joint Powers Board, and the
Transbay Terminal site, favored by most transit advocates".

SFT endorses exetnding the Muni 83 Line to Broadway and the II-268
Embarcadero. This will be an important transit link between the
11.8 Embarcadero and North Beach and Chinatown and will provide needed
transit service to development that will probably occur on the now
vacant lots formerly occupied by the Broadway ramps of the
Embarcadero Freeway.

11.7.3 The number of buses per hour given for Fremont St. in Table 4.5-15 II-265
appears to be in error.

City & County of S.F.
Dept. of City Planing

OCT 05 1995

OFFICE OF
ENVIRONMENTAL REVIEW

October 4, 1995.

Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Dept.
1660 Mission Street
San Francisco, CA 94103

John R. Schultz
Federal Highway Administration
980 Ninth Street, #400
Sacramanto, CA 95814

Thank you for the opportunity to comment on the DEIS/DEIR
"Alternatives to Replacement of the Embarcadero Freeway and
the Terminal Separator Structure" dated August 25, 1995.

11.7.3 On pg. 10 of Section 4(f) starting on line 7 is the statement III-265
"- Harrison Street would be made a one-way westbound street between
First and Third Streets." This action should be added to the "Street
and Operational Improvements Common to All Build Alternatives" on
pgs.61,71, 77 and 85.

11.1.2G Why is the opening of Davis Street between Clay and Washington Streets II-182
not included in Alternatives 2 and 4 as well as 3 and 5?

Figure 2-1A shows vehicles three abreast in a 45-foot roadway whereas
Figure 2-2A shows the same relative lateral position of vehicles II-264
in a 37-foot roadway. The 45-foot roadway would, in fact, accommodate
11.7.2 four lanes of moving traffic. The rail transit vehicles depicted
with pantograph in these exhibits are LRV's, not the PCC streetcars
that will be used on the F-line. This could be misconstrued as extending
the LRV service on MMX northerly from the Ferry Building.

Alternatives 3 and 5 propose a new on-ramp from Harrison Street west
of the Essex Street intersection to connect to I80 westbound/US 101
southbound at Fourth Street. This is circled item 3 on figures 2-3,
2-4, 2-6 and 2-7. A major approach to this on-ramp would be via Essex
11.1.2 Street, southbound. Since the north end of Essex is accessible only II-181
E at Folsom Street, a one-way street eastbound, all traffic bound for
Essex Street would first cross the intersection of Folsom and Second
Streets. Drivers southbound on Second Street going to the on-ramp
would have to make a left turn onto Folsom Street. It would be more
direct if this proposed on-ramp intersected Second Street at grade.
This would eliminate the need (and cost) for a structure to carry
the on-ramp over Second Street.

11.3 A flaw in the analysis is stated in the fourth line on pg. 89 II-194
"-- and their (related projects) impacts are not analyzed in this
EIS/EIR." The new King Street ramps to I280 (pgs.91,92) will provide II-213
11.4.3 a facility never had before; a second on-ramp from downtown to I280
via The Embarcadero. This new on-ramp will also be directly accessible
C via Fourth Street. Peninsula-bound drivers southbound on Fourth Street
approaching Harrison Street will have the option of choosing lanes
1 or 2 to I280 or lanes 3 or 4 to 101. The beneficial effect on the
level of service of the intersection of Harrison and Fourth Streets
that is provided by this new entrance to I280 should be analyzed.
It is significant that two lanes will be provided for Fourth Street
through traffic to bypass queues waiting to enter 101. This should

be compared with conditions on The Embarcadero.

On pg. 505 the Port of San Francisco expresses concern "-- freight
movement to the southern piers from the north will be impaired during
the PM rush hour due to queuing for the Bay Bridge on the surface
lanes of The Embarcadero." In the Incident Analysis, figures 4.5-11,12
11.4.3 and 13 show southbound Embarcadero queues two or three blocks long
preceeding the Harrison Street intersection. Since the southbound II-213
Embarcadero roadway will allow only two lanes of moving traffic south
of Howard Street there seems to be cause for the Port's concern if
one of these lanes is blocked. This will not only interfere with
freight movement, it will impair all traffic access to the new I280
on-ramp from King Street. This concern was expressed in my letter
to Barbara Sahm March 1, 1994.

11.1.2F The validity of an HOV lane, either on Sterling Street or on Essex II-182
Street should be examined.

Conditions external to the Freeway Operations Study Area shown in
figure 4.5-14 (pg.284) have the governing effect on freeway conditions
within the study area.
This EIS?EIR could be the start of more comprehensive consideration
of San Francisco auto and truck transportation needs for the 21st
century.
For eastbound traffic, the Bay Bridge is an absolute constraint. II-218
11.4.4 For westbound traffic, some physical improvements should be considered.
B An appreciable portion of traffic westbound on the Bay Bridge has
destination, without intermediate stops, south of the junction of
US 101 and I 280 near Alemany Boulevard. An elevated two-lane structure
above the existing six and eight lane roadway and viaduct could divert
this non-San Francisco traffic. The existing freeway and ramps system
would serve for the intra-city entrances and exits. This should relieve
much of the queuing on downtown surface streets for peninsula-bound
drivers.

Very truly yours,

Gordon Chester

Gordon Chester, P.E.
1334 23rd Avenue
San Francisco, CA 94122-1608
(415) 665 1369

cc: Dennis Bouey

(415)391-3339

CITIZENS for OPEN SPACE and to RETAIN the VAILLANCOURT FOUNTAIN
440 Davis Court, #311
San Francisco, CA 94111
Founder/Representative: Eula M. Walters

September 27, 1995

To: Public hearing.
EIR, EIS, Draft Environmental impact Statement/Report.

Re: Ferry Park (Blocks 202 & 203), located on The Embarcadero between Washington and Clay, and bordered on the west by Davis Street.

Request: The above captioned group of over two thousand persons who work, live and play in and around Ferry Park desire unequivocally that Ferry Park remain as soft scape open space (OS) for recreational purposes, and that no buildings or roads be permanently placed upon it.

11.3.2 Reasons: **II-196**

° Planning Code 139 requires that this down-town area be set aside as a park.

° Ferry Park is not intended to be"sold-off" under SB 181.

° A child care center must be placed inside the Embarcadero Center buildings, and in the Maritime Plaza level building, NOT on Ferry Park.

° A Play Ground for kids with swings, slides, exercise bars should be placed on Ferry Park to accommodate the seven existing Child Care Centers in this area.

° Maintenance of Ferry Park should continue by the Recreation-Park Department as it has been over 30 years.

II-268

11.8 OPPOSED: The above captioned group are opposed to the Draft Enviromental recommendations:

1) That Parking Garages be placed under or on Ferry Park
to satifsy the financial needs of the Port or any other reasons.
RATIONALE: Every form of public transportation leads to the
Ferry Building. There are already more than enough parking
11.6.2 garages in this area. More garages means more traffic and
hence, more pollution. The existing soil is "fill-in", unstable
and polluted. It has been extimated that underground parking **II-258**
would cost over $50,000 per space ---Parking is free at the
Embarcadero Center Garages after 5 p.m. and on weekends.

2) Opposition to reconfiguration of Washington Street at
Drumm: Leave the street as it is. Widening would displace
the Pump Station located on Ferry Park that is needed as a
Children's Center and restrooms. Widening the street would **II-183**
11.1.2 H increase traffic and endanger lives. This area already is
rated by the Draft as a D.

3) Comment on the human use of Ferry Park published in the Draft. The opinion by the above captioned group is that this report is a great continued effort by the Draft people to

to sell off Ferry Park --- the last and only public park left in this area. A further observation is that the lack of a survey of the Maritime Plaza points to the fact that that "Park" is so STERILE that nobody uses it. Which brings us to the well-known statement that "you can prove anything you want to." Huh? Rec-Pk should water park at night time.

4) Expand the east side of Ferry Park as part of Justin
Herman Plaza. NEVER! The Embarcadero Center has done
very little to promote hospitality to the Justin Herman
Plaza. The upkeep is left wanting. The Gazebo smells like
a back lot of Naples. They request Police Cars be parked **II-196**
11.3.2 right in the middle of the Plaza -- this gives to the public
a feeling of"stay away" -- it is very intimidating and it
exists to,today. Too, The Embarcadero Center promoters would
also want to reconfigure the wonderful Vaillancourt Fountain
the only one of its kind in the world, and the most photographed
and visited fountain in San Francisco. Ferry Park should
remain apart from the clutches of the Embarcadero Center --
who run Justin Herman like they own it and add nothing to
make it an inviting, friendly place to be.

4) Sell off Ferry Park and use the proceeds to buy cememt for the roadway and Justin Herman Plaza? Response: The mere thought that the politicians and agency staff would equate a green park with birds and trees to mean the same thing to the citizens as a few tons of cement, questions the values? The health and safety of the citizens is the greatest need. This area is already overbuilt in height and density. The Embarcadero Center stands like a ghost over this area covering it with a shroud of shadows.

END ° As Reverend Tutu said in July when he attended the 50th Anniversary of the U.N. -- "We need trees, birds, green grass."

Thank you for your consideration.

Ferry park

Lula M. Walters
Representative

PIER 33 NORTH THE EMBARCADERO SAN FRANCISCO CA 94111
TEL 415-433-0870 FAX 415-433-2112

DeMARS&
MALETIC

23 October 1995

Barbara W. Sahm
Environmental Review Officer
Office of Environmental Review
1660 Mission Street
San Francisco, CA 94103

RE: Replacement Alternatives for the Terminal Separator Structure (TTS) and the Mid-Embarcadero Roadway

SUBJECT: Draft Environmental Impact Statement / Draft Environmental Impact Report 92.202E & 94.060E

Dear Ms. Sahm:

The enclosed material is in response for comments to the above document on the above project.

11.8 The Alternative 5 concept has been in process since 1990 and even with the changes and developments that have taken place in the past 36 months, 90% of the original concepts are still present and valid. The major change introduced on the publication date of August 25, 1995 was to introduce the DPT Varient, applicable to Alternative 3, and applicable to Alternative 5. II-268

The last 99 pages of the document identify land tracts in the area of the project subject to the jurisdiction of Section 4(f) of the Department of Transportation Act (49 USC 1653(f)); but do NOT ADDRESS any possible solutions. Instead, a "Mitigated Alternative 5" plan in introduced as shown in drawing on page 65 of this last section.

11.5.10 The intent of Section 4(f) was to preclude the routing of federally funded highways or freeways through large natural park areas or the displacement of buildings or sites of historic significance such as Yellowstone Park or the Manassas battlefield, or, locally, the Presidio or the Ferry Building itself. What is needed in the design process for the Final EIS/EIR is a lawyer who can advise how the best design results can be achieved, Section 4(f) notwithstanding, for it can be done! II-257

PIER 33 NORTH THE EMBARCADERO SAN FRANCISCO CA 94111
TEL 415-433-0870 FAX 415-433-2112

DEMARS & MALETIC

23 October 95
Page Two

Also, the replacement of the northbound underpass in front of the Ferry Building with a surface roadway consisting of three traffic lanes was at my request on II-175
February 27, 1994 to the CAO's office. The Office of the Chief Administrator for the
11.1.2A City and County of San Francisco was either negligent, inept, or both to not inform you of the condition of the request was that an underpass alternative remain to be studied in DEIS/DEIR. At this time I request you "re-instate" an underpass alternative, in northbound direction only, into the Final EIS/EIR.

A thorough review of the enclosed documents is required to fully understand the evolution of the numerous modifications requested by various City departments and agencies that have been incorporated in the past year and a half. The materials are basically chronological from the past to the most recent description of the recommendations made by the Citizens Advisory Committee for the Embarcadero Project (CACEP) on October 15, 1991.

Carl Maletic

Vernon DeMars, FAIA

Carl Maletic, Architect

cc Port of San Francisco, Ms. Sharon Poledri
Office of Chief Administrative Officer, Mr. William Lee

Enclos. Letter to CAO

LICENSED ARCHITECT
CARL P. MALETIC
No. C24044
REN. 3-31-97
STATE OF CALIFORNIA

Mid-Embarcadero Plaza Plan

FERRY BUILDING PLAZA 1934

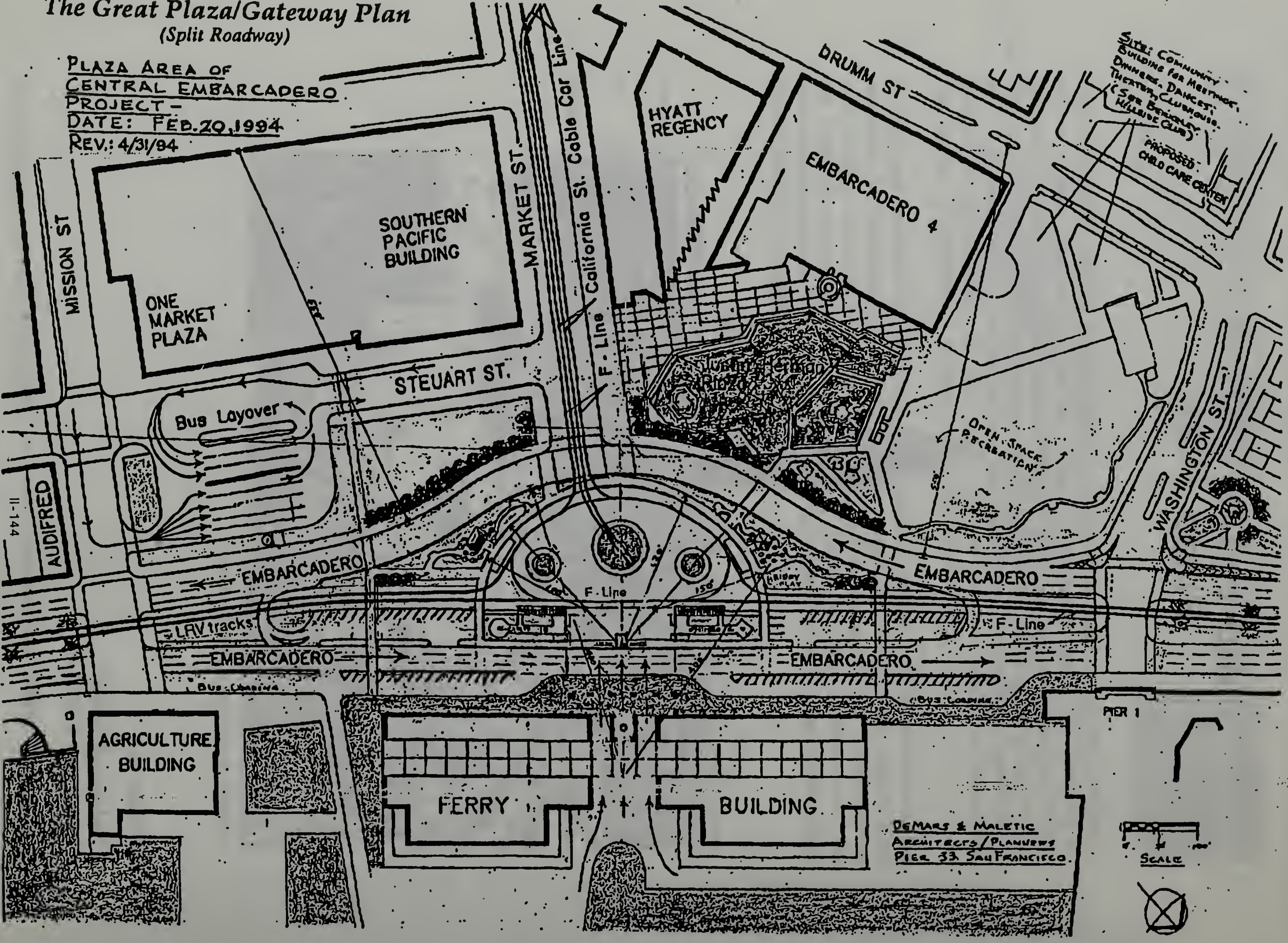
Prepared by:

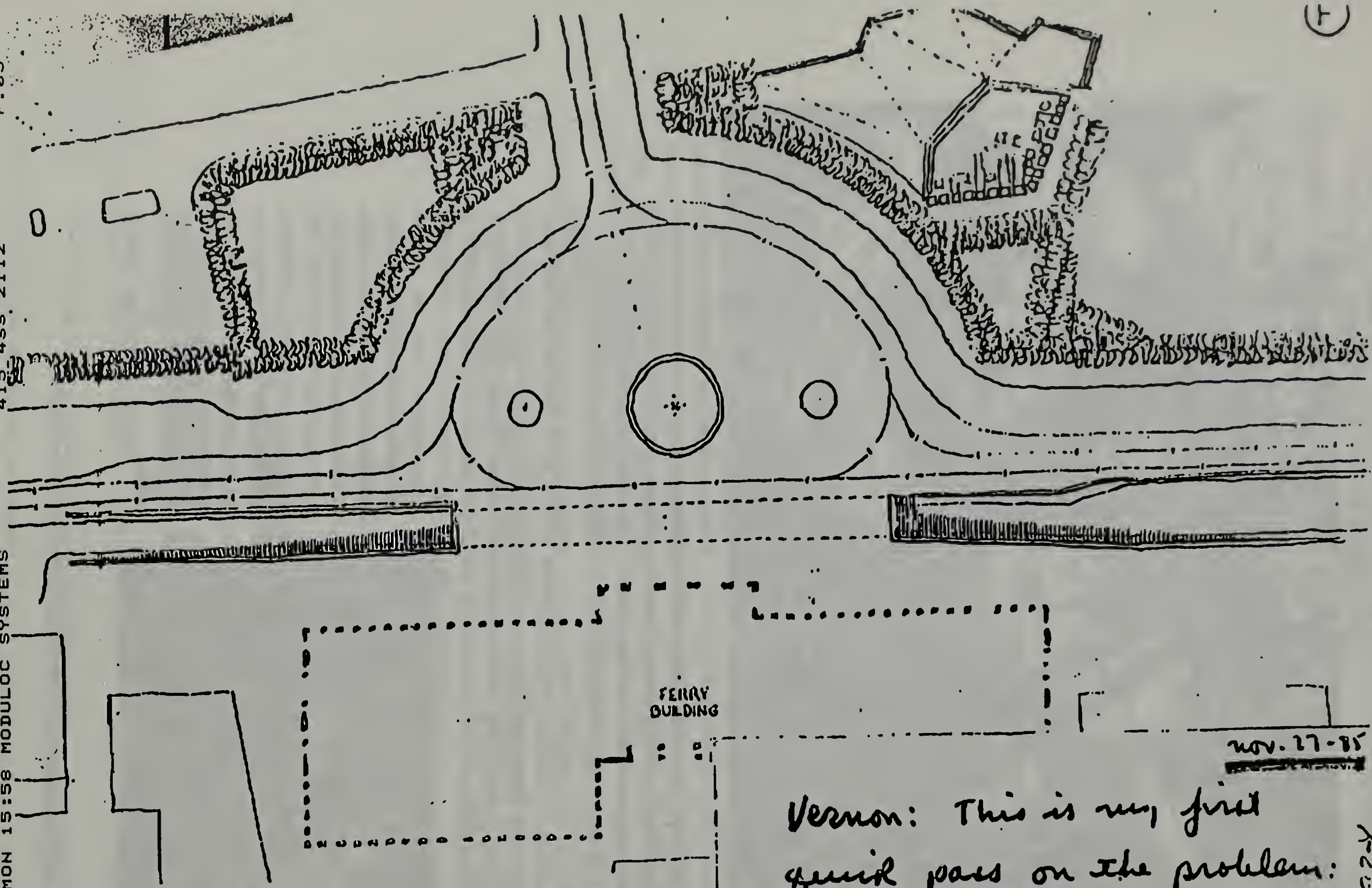
DeMars & Maletic
Architects / Planners

23 October 1995

The Great Plaza/Gateway Plan

(Split Roadway)





The late Dick Hedman was the very talented Chief Urban Designer on the staff of the Department of City Planning in 1985. Dianne Feinstein was then mayor and led a campaign for the removal of the Embarcadero Freeway. At that time, Hedman proposed this concept for a Ferry Building Plaza that would be made possible if the freeway structure were removed.

nov. 27-95

Vernon: This is my first quick pass on the problem: a hybrid solution. It can be tightened up, made stronger but some real problems remain. I would appreciate your thoughts

Ferry Building Plaza

The size of the plaza needs to be conceived as a function of the length and gradient of the underpass portals, the distances between Mission and Washington Streets, the number and widths of lanes for stacking and left turn lanes. The resulting dimensions of the plaza as indicated on our preliminary sketches is nearly the exact dimension of London's Trafalgar Square. It is pure coincidence that they also share other elements as well; two fountains, and the relation of the National Gallery in London to the Square being almost identical to that of the Ferry Building and its' proposed Plaza. This comparison may be of help in visualizing the adequacy or not of the dimensions proposed.

The totality of the man-made and geographical elements in San Francisco is possibly even grander than that of London. The convergence of all the pedestrian and transportation elements at this spot demand not only an uncompromising functional resolution but a beautiful and inspiring one. Nothing seems to be standing in the way of this world class realization.

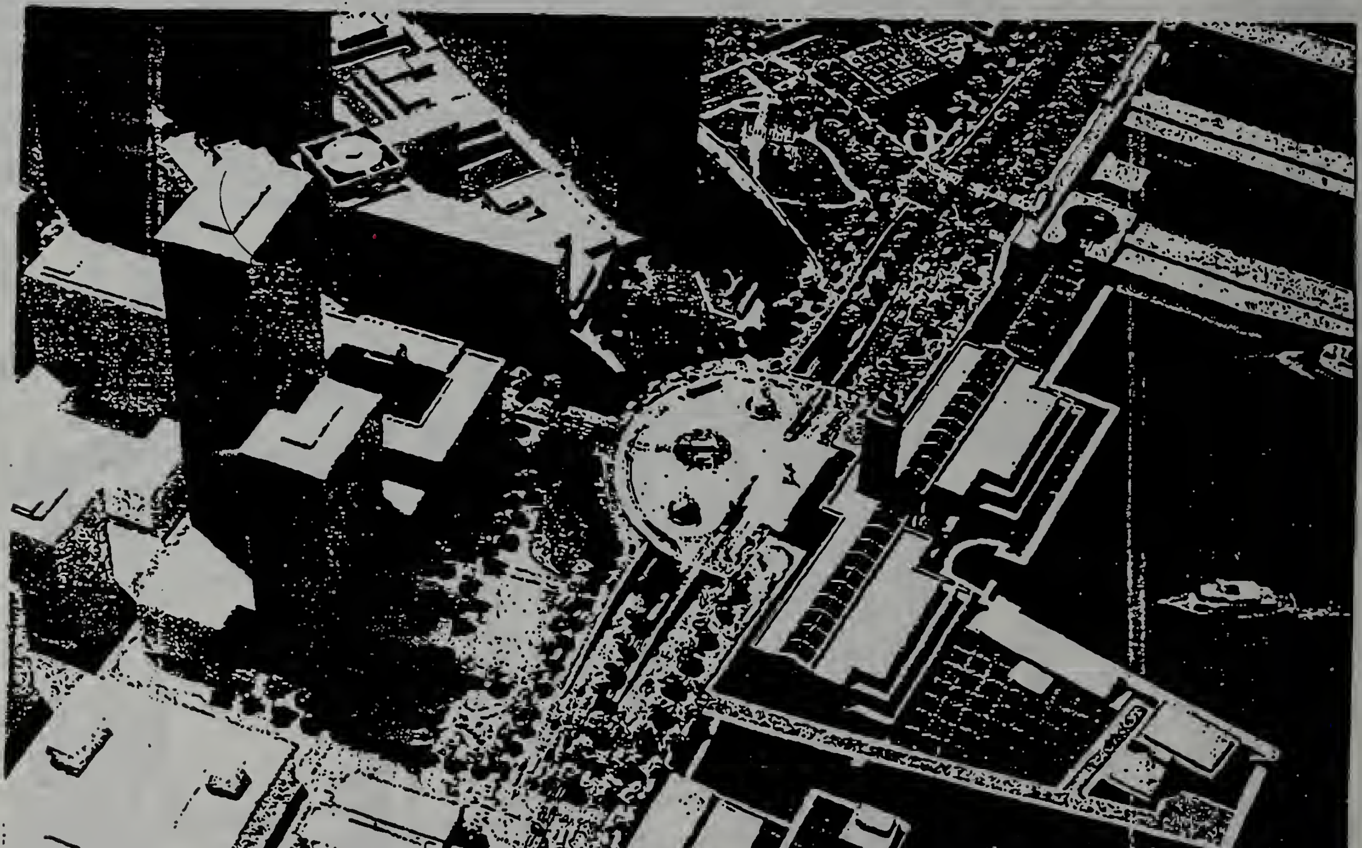


Photo of model in 1991 shows early plan: Underpasses both north and south.

Tue.
8/25/92.

San Francisco Examiner

William R. Hearst III
Editor and Publisher

Paul Wilner *Assistant Managing Editor, Features*
Tim Porter *Metropolitan Editor*

A Trafalgar Square for S.F.?

FIFTEEN SECONDS of rock 'n' roll ground motion doomed the Embarcadero Freeway during the Loma Prieta earthquake in October 1989. Three years have elapsed since then without a plan to redesign the foot of Market Street at the Ferry Building.

A final plan is another two years away, but The City's officialdom will gather behind closed doors Wednesday to decide what's *not* going to happen. City executives will pick five alternative plans for study in the environmental impact report.

The first alternative is to do nothing. As recommended by the staff engineers and designers, both the next two alternatives call for eight lanes of surface traffic (one would have access ramps to the Bay Bridge and the Bayshore, the other wouldn't).

The fourth and fifth alternatives would drop the eight lanes in front of the Ferry Building into long tunnels. Both are now considered unrealistically expensive.

The staff recommendations exclude an imaginative plan that would send four lanes of northbound traffic through a short tunnel and four southbound lanes curving on the surface around a plaza. Its designers compare the concept to London's Trafalgar Square. As set forth by Berkeley architect Vernon DeMars, former head of the UC-Berkeley Department of Architecture, and Carl Maletic, chairman of urban design for the American Institute of Architects, the plaza would become a hub for California Street cable cars and the proposed historic streetcars to Fisherman's Wharf.

This should be easy decision: Include the DeMars/Maletic plan. Whatever ultimately is built, it should place an architectural exclamation point where The City's grandest boulevard meets the Bay.

At the Wednesday meeting the
City's heads of departments
voted unanimously to include
the DeMars/Maletic plan,
(alternative 5A) in the EIR

S|F
A|C

SAN FRANCISCO ART COMMISSION

March 25, 1994

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Frank M. Jordan

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Public Art Program

Street Artists Program
Suite 70
415.252.2581

Art Commission Gallery
155 Grove Street
415.554.9682

City and County of
San Francisco

Emilio Cruz
Waterfront Transportation Projects
Chief Administrator's Office
City Hall
San Francisco, CA 94102

Dear Emilio:

Thank you for attending the March 21st Civic Design Review Committee meeting and for discussing the design options for the Mid Embarcadero with the Committee. The points discussed and position of the Civic Design Review Committee are outlined in this letter, and I would like to request your assistance in relaying this information to the Citizen's Advisory Group, the Technical Advisory Group and any other appropriate groups or individuals.

The position of the Civic Design Review Committee is to support the splitting of the Embarcadero roadway into two narrower roadways. The reasons for supporting this position and points raised at the March 21st meeting were as follows:

1. The Committee felt that the ease of pedestrian flow would best be achieved by splitting the roadway into the two narrower roadways.

2. Splitting the roadway would allow for the development of turnback loops at either end of the Ferry Building which would provide an appropriate and safe location for pedestrian crossings.

3. The split roadway design would represent a major civic design opportunity in the joining of two of the most important streets in San Francisco - Market Street and the Embarcadero. Market Street should be connected to the side of the Embarcadero instead of ending in the existing "dog leg". Any potential traffic problem created by joining Market to the Embarcadero can be controlled through bollards or other traffic control devices until proper traffic studies can be completed. By taking this approach, there should be no delay in the timely execution of the project. The Market Street connection also creates a safe crossing place for pedestrians across the Embarcadero.

4. The split roadway design would allow Justin Herman Plaza to continue as the "front porch" of the Embarcadero Center and allows for the creation of a new piazza for the Ferry

Building. The character of this new piazza could potentially focus more on the transportation aspects of the Embarcadero and Ferry Building.

The members of the Civic Design Review Committee support the design concept which has been put forward by the Port. This scheme should be studied further as part of the Waterfront Transportation options.

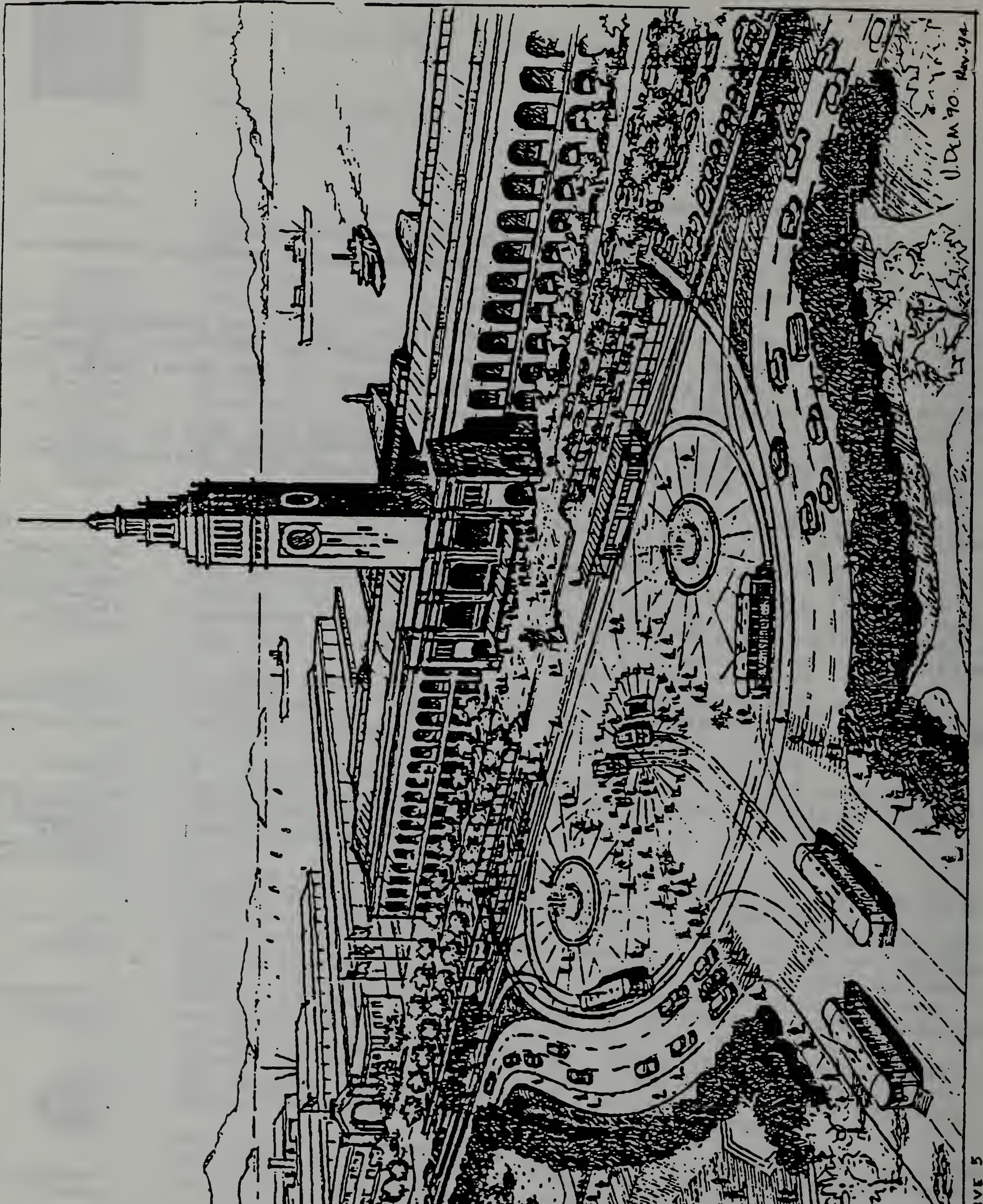
Thank you again for meeting with the Committee and we appreciate your assistance in distributing this information.

Sincerely,

John Kriken

John Kriken
Chair, Civic Design Review Committee

cc: Rebecca Kohlstrand
Dennis Bouey
Dan Hodapp
Joanne Chow Winship
Jill Manton
file



ALTERNATIVE 5

SPLIT ROADWAY

This proposal shows the urban design possibilities of a "split roadway" concept. It was developed in response to the specific recommendations of the Citizens' Advisory Committee on the Embarcadero Project (CACEP) in their publication of October 15, 1991. This alternative, currently Alternative 5 under study in the EIS/EIR process, retains 95% of the Justin Herman Plaza as the *people gathering* place, which it does so successfully at present. A split roadway makes possible a Ferry Building plaza as the *transportation hub* – referred to repeatedly in the CACEP report – and which together with other adjacent open spaces is summarized as:

- "Create a grand civic space at the foot of Market Street which reflects the scale of the Ferry Building, which reconnects the Downtown to the Waterfront, accommodates a multitude of cultural and recreational activities, and at the same time serves as a transportation hub for pedestrians, bicycles, ferries, streetcars, buses, subways, and cable cars."

- "Preserve the architectural integrity of the Ferry Building, and reflect its historic use and character in the plaza design."

- "Design the area in a way that expresses the best of San Francisco: beauty, sensuality, generosity, openness, hospitality, tolerance, civic pride and rich history, enabling it to become one of the most important urban spaces of the city in terms of use as well as symbolic and emotional value."

Much of this above statement has been used in the Urban Design Guidelines of the Mid-Embarcadero Open Space (MEOS) sub-committee under the title VISION STATEMENT as a preamble to their final recommendations dated 6/20/94.

COMPARATIVE PLANS

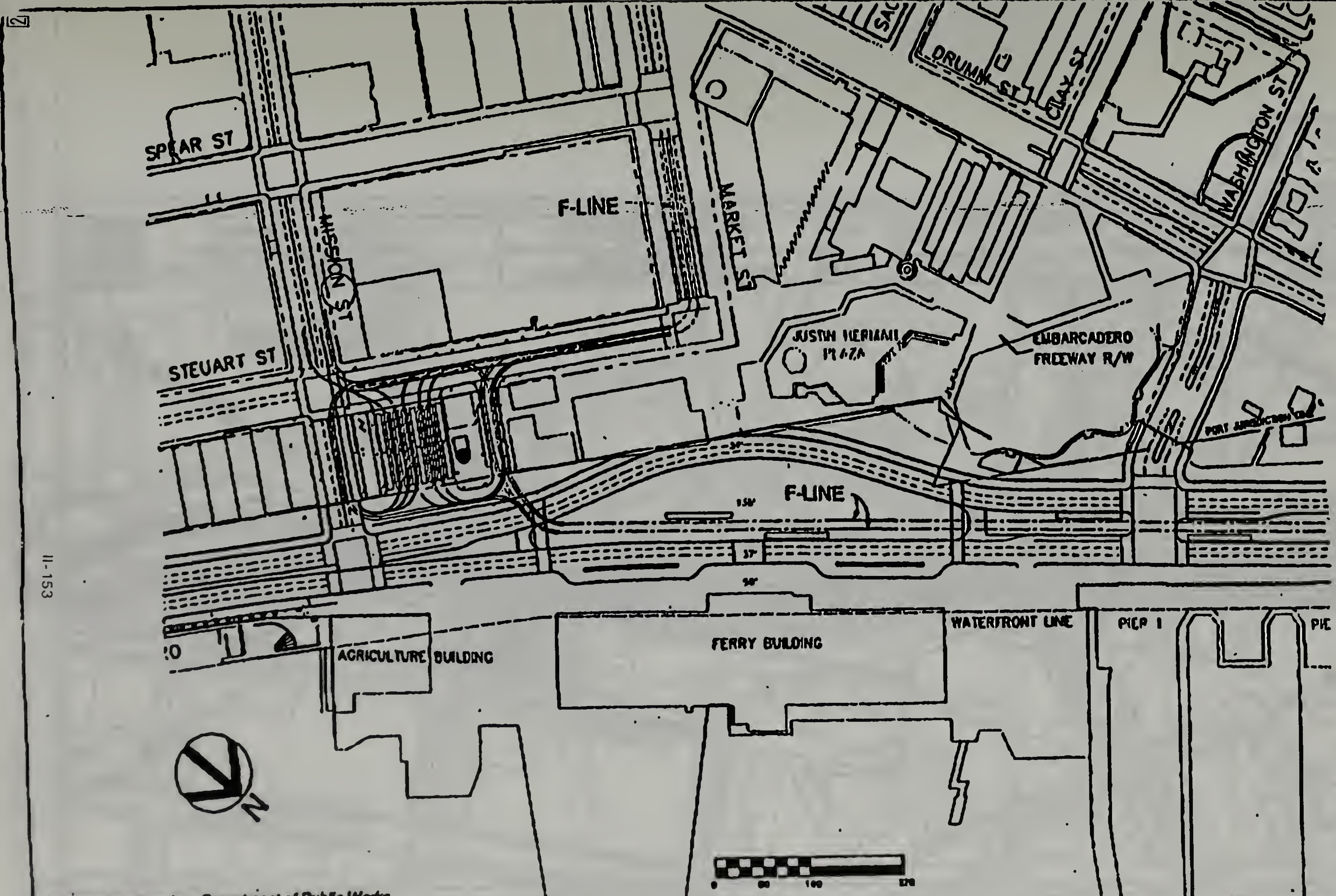
Split Roadway
vs.
Paired, Curved Roadway

The final public report of the CAO's Waterfront Transportation Office, dated August 4, 1994, described the Split Roadway as follows:

> *"This alternative was advocated by the Port, the Art Commission and supported by some members of the MEOS Subcommittee. The split roadway alignment provides for a major public plaza in front of the Ferry Building between the north and southbound roadways. The symbolic importance of the intersection of Market Street and The Embarcadero is emphasized by extension of the F-Line in the Market Street corridor through the open space area, looping between the roadways in the newly created public plaza, and continuing north on the Embarcadero in the median. This design creates three distinct plaza areas: two on the land side, north and south of Market Street, and one in front of the Ferry Building."*

In the Split Roadway alternative the light rail line would also continue south in the median, as preferred by the Port. This rail line would thus run the entire length, north to south, on the Embarcadero, and not require Muni's proposed encroachment 40 feet eastward for their bus layover and F-Line track. (See Page 26 for cross sections) The 25 foot wide promenade continues across the face of the Ferry Building.

The Paired, Curved Roadway alternative creates a 138 foot wide obstacle for pedestrians to cross, while the 200 foot wide plaza in the split roadway alternative would accommodate heavy pedestrian flow and permit them to cross two narrow roadways rather than a single broad one.



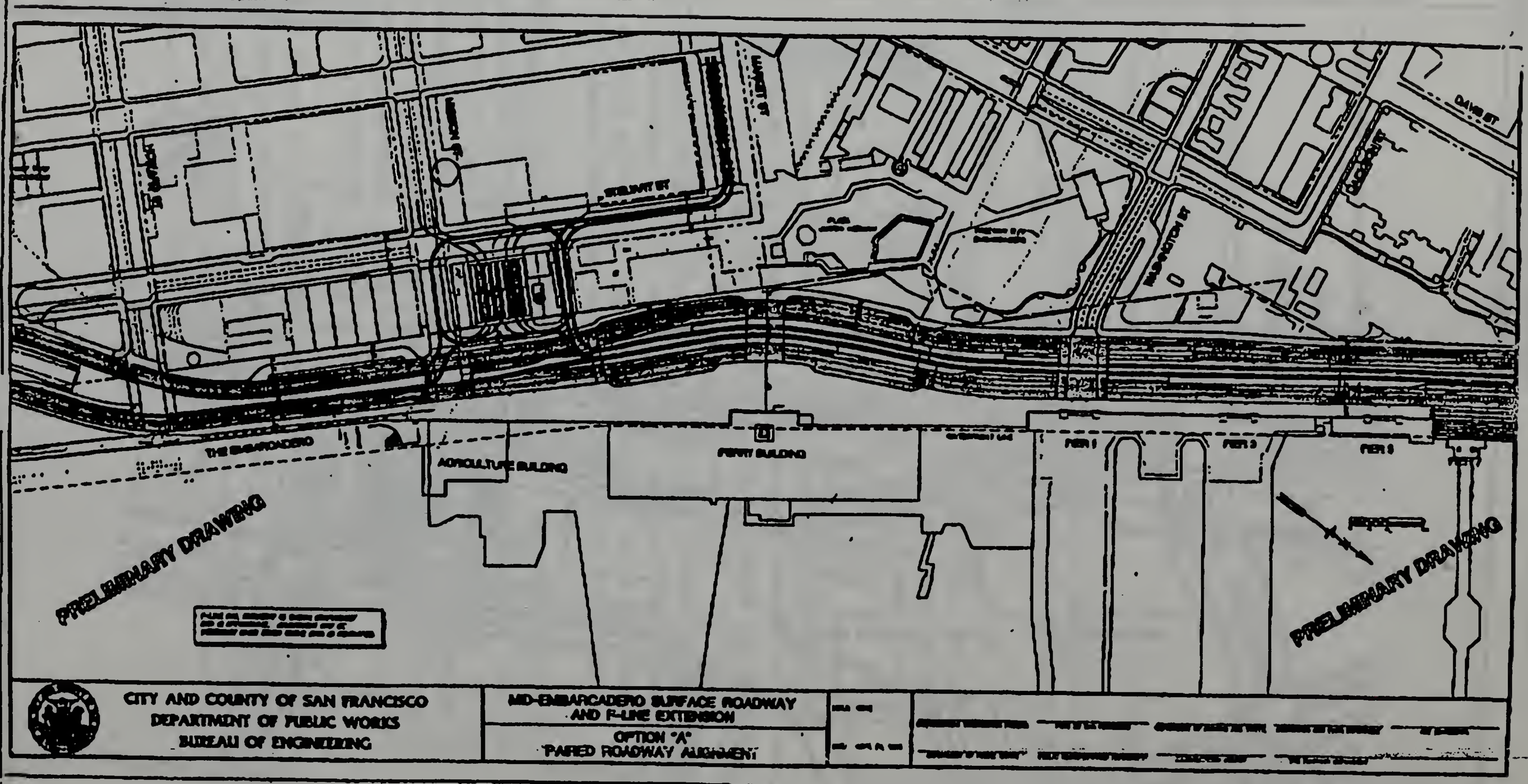
Source: San Francisco Department of Public Works
Parsons Brinckerhoff Quade & Douglas, Inc.

92.202E & 94.060E
Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

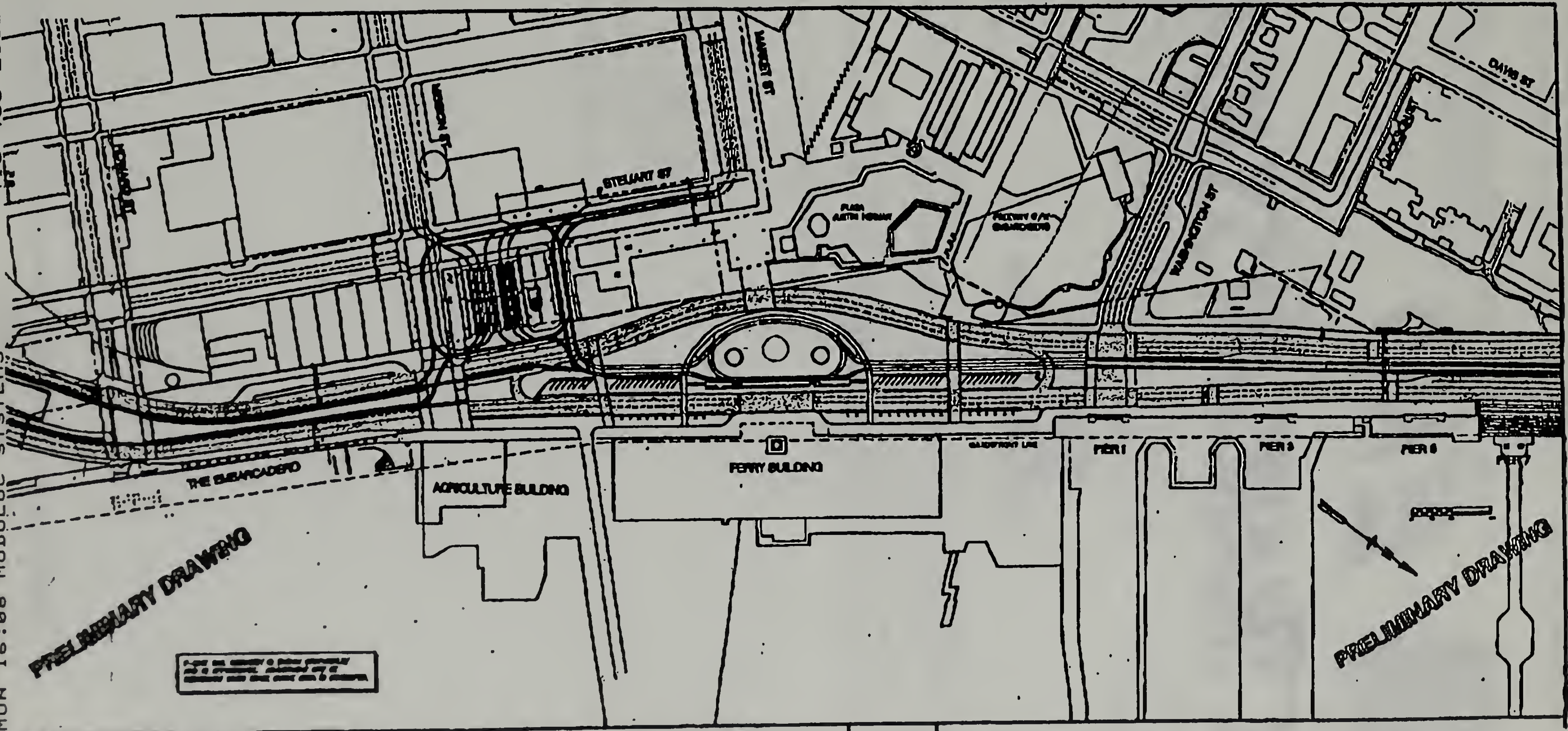
Mitigated Alternative Five

Figure 4.1-5

From the EIS/EIR of Aug. 1995


HOWARD ST
MISSION ST
STEUART ST
MARKET ST
WASHINGTON ST
DAVIS ST
THE EMBARCADERO
AGRICULTURE BUILDING
FERRY BUILDING
PIER 1
PIER 3
PIER 5
PIER 7
PRELIMINARY DRAWING
PRELIMINARY DRAWING
CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
MID-EMBARCADERO SURFACE ROADWAY
AND F-LINE EXTENSION
OPTION "A"
PAIRED ROADWAY ALIGNMENT

ALT.3



CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING

MID-EMBARCADERO SURFACE ROADWAY
AND F-LINE EXTENSION

OPTION "B"
SPLIT ROADWAY ALIGNMENT

Revised by: DeMars & Maletic
PIER 33 - NORTH
THE EMBARCADERO
SAN FRANCISCO, CA 94111

23 oct 95

ALT.5

END

FAX TRANSMISSION

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PIER 33 - NORTH
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SAN FRANCISCO, CA 94111

Gitelman

PIER 33 NORTH THE EMBARCADERO SAN FRANCISCO CA 94111
TEL 415-433-0870 FAX 415-433-2112

DeMARS&
MALETIC

2 October 1995
VIA FAX: (415)-558-6409
-4 pages with cover letter-

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OCT 02 1995
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

City Planning Commission
ATTN: Linda Avery, Administrative Secretary
RE: Thursday, September 28, 1995 @ 3:30 p.m. meeting
Commission Review of Embarcadero DEIS/EIR

Linda Avery,

As per Barbara Sahm's request I am having my administrative assistant fax you a transcript of my verbal statement at the above Commission meeting.

Please put our firm on the mailing list for minutes of this meeting and future meetings of the City Planning Commission until January, 1996.

Thank you for your consideration.

Sincerely,

Carl Maletic

Carl Maletic, Architect

Vernon DeMars, FAIA & Carl Maletic, Architect, Architectural & Planning Consultants

DeMars & Maletic
PIER 33 - NORTH
THE EMBARCADERO
SAN FRANCISCO, CA 94111

1 of 4

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DEPT OF CITY PLANNING

VERBALCOMMENTS TO SAN FRANCISCO PLANNING COMMISSION
SEPTEMBER 28, 1995

My name is Carl Maletic. I am a San Francisco architect with 26 years experience in the areas of engineering and urban planning. First of all. Thank you, Barbara Sahm and Hillary Gittleman, your staff and the outside consultants for the amount of work required to produce these documents.

My firm of DeMars & Maletic has been involved in the public process of this project from it's inception with the Citizens Advisory Committee for the Embarcadero four years ago and with similar projects over the past 40 years.

As is obvious this project breaks down into two distinct projects: the Mid-Embarcadero and the Freeway Ramps

These are respectively Project Title 92.202E and Project Title 94.060E.

11.7.1C II-262

As many at this hearing know, Title 92.202 refers to September of 1992 when the first project, then referred to as Replacement of the Embarcadero Freeway, began to be studied by the Planning Department and it's consultants. Title 94.060 was added in January of 1994 to add the Terminal Separator Structure.

Why it has taken three years to conduct this study is not commonly understood by the public. Why **has** it taken so long? The answer is because it is actually **two** EIR studies.

By appending the Roadway to the Terminal Separator, the proposed duration of the study grew from **18** months to **36 months**.

FREEWAY RAMPS

This is why we do not see a completed roadway in front of the Ferry Building today. Let me speak to the two projects separately. First, the Terminal Separator Ramps:

2 of 4

The summary, as I interpret it, of this draft EIS/EIR identifies only two significant environmental impacts. Those are number one, traffic congestion and number two, archeological resource. II-213

11.4.3 C

Many speakers last night stated that: "additional ramp capacity leads to additional traffic congestion."

MID-EMBARCADERO ROADWAY

The configuration of Mid-Embarcadero Roadway basically breaks down to two alternatives. Alt. 3 consisting of a paired, curved roadway with a small plaza directly in front of the Ferry Building; Alt. 5, a split roadway consisting of a large plaza placed between the northbound and southbound roadways.

Alternative 5 creates easy pedestrian access to the Embarcadero waterfront by splitting the roadway into two thinner roadways. At the same time the plaza would function as a central transfer hub for ferries, the F-line, surface LRV's, and possibly the California Street Cable Car line.

Justin Herman Plaza can remain as it currently is: an effective people-gathering place for this area.

In comparison, the paired, curved roadway alternative is a compromise which divides the entire open space and creates a barrier to pedestrians wider than Van Ness Avenue and eliminates any opportunity for a grand plaza adjoining the Ferry Building.

The current configuration of the roadway is essentially a split roadway which appears to be working just fine, even despite the Muni Metro construction in the area. A split roadway not only moves traffic well but also creates ample

3 of 4

space for such activities as the Farmer's Market, which is currently held at this location.

It is our considered opinion that Alt. 5, regardless of 5A or 5B, that the split roadway would **actually** save time in design and construction and be a **superior** urban design solution. The Mid-Embarcadero Plaza should not be some work of pop art, but should relate to the "Beaux Arts" design of the Ferry Building and emphasize the relationship of Market Street with the Embarcadero and the Bay. A divided roadway would facilitate this.

After the great earthquake and fire of 1906, the angular duality of the San Francisco street grid south of Market Street and north of Market Street had the opportunity to be united in a grand semicircular world-class plaza where "the city's grandest boulevard meets the Bay." In the haste to re-build the City from the ashes the street grid remained disjointed and the opportunity was lost. II-223

11.4.6C

[Today the area in front of the Ferry Building is beautifully vacant, but an invisible demarcation line has drive a spike between the city of S.F. and the Port of S.F., thus eliminating an urban design that would bring focus to the city's arteries.]*

***Not delivered in the oral comments.**

After nearly five years of community participation, urban planning studies, environmental impact studies, Redevelopment Agency studies, Municipal Railway studies, Planning Department studies, Recreation and Park studies, financial feasibility studies, Ferry capacity studies, Board of Supervisors votes, and endless analysis by a dozen commissions, "The City that Knows How" is about to opt for a compromise of a compromise of a compromise, which would bisect the space with a 131-foot wide surface roadway/rail configuration, literally cutting off city from its own waterfront.

The double-decked freeway that was removed along the length of Embarcadero opened up a unique opportunity we should not miss.

4 of 4

The Terminal Separator has little to do with the alignment of the Mid-Embarcadero! The fact that they both are included in the same report has to do with the availability of FEMA funds. Including the Terminal Separator with the roadway has muddled the decision making.

11.7.1 I urge this commission and the various six commissions who will further review this draft EIS/EIR, and the Housing and Land Use Committee, and the full Board of Supervisors that they vote **twice**: **once** on the freeway ramps and once on the Mid-Embarcadero roadway alignment alternatives. II-262

I ask that you use what influence you have to pass this along to the other commissions.

Thank you.

Question from Carl Maletic to Rebecca Kohlstrand:

"Would you agree that applying the DPT Variant to Alternative 5B would result in the same traffic impacts? The DPT Variant can be applied to Alternative 3 or Alternative 5."

Response from Rebecca Kohlstrand:

"Yes, I would have to say yes."

<END OF TRANSMISSION>

GOLDEN GATEWAY CENTER
A LIMITED PARTNERSHIP

460 DAVIS COURT · SAN FRANCISCO, CALIFORNIA 94111-2496
TEL (415) 434-2000 FAX (415) 989-5034

October 19, 1995

RECEIVED
OCT 20 199
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Ms. Barbara W. Sahm
Environmental Review Office
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

Reference: Alternative to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm:

We are the owners of Golden Gateway Center, a 1,254-unit residential property bounded by Jackson, Battery, Washington and Drumm Streets and of adjacent Sidney Walton Park as well as the Golden Gateway Tennis and Swim Club located along the Embarcadero.

The removal of the elevated Embarcadero Freeway was generally regarded as a positive change by the ownership and residents of Golden Gateway Center as it abated noise, vehicular air pollution and a visual obstacle. We would view favorably any plan which facilitates vehicular traffic while encouraging the use of public transportation along the Embarcadero and foot traffic through the area.

A primary focus of concern for Golden Gateway Center is the disposition of Blocks 202 and 203 which border our property along Washington Street and the streets which would be affected thereby. Those concerns are as follows:

11.1.2H 1) Washington Street - We are opposed to the widening of Washington Street and likewise are opposed to a change to two-way traffic for that portion of Washington Street which borders our property. As it is, this length of Washington Street is traveled at relatively high speed and requires caution by the high number of pedestrians which travel from or through our property toward Downtown. **II-183**

11.1.2G 2) Davis Street - We have no objections to opening Davis Street to vehicular traffic between Clay and Washington Streets as long as appropriate means of traffic control are implemented to assure pedestrian safety and to abate noise and air pollution. **II-182**

11.3.2 3) Use of Blocks 202 and 203 - We do not have a specific agenda for what might occupy this space. We believe that any structure over 2 stories high would have a deleterious effect on our existing tenants and on the rental rates of apartments in the southeast quadrant of our property. The impact would be most severe on our townhouses which are high-rent units. We would wish to see adequate off-street parking provided for use by tenants/invitees of any commercial or residential user of the blocks. Consideration must also be given to the control of noise and litter. **II-196**

If, as has been discussed, the use is to be for an auditorium or convention/meeting facility, we would want it to be used for events in keeping with the demographic composition of the neighborhood. One use under consideration, as we understand it, is the installation of a Farmers Market and we have no objection should that become the choice.

We appreciate this opportunity to express our views and look forward to the development of this area in a manner which will effect positively the living and working environment of our neighborhood.

Sincerely,

GOLDEN GATEWAY CENTER

Barney Lane, RPA
General Manager

BL/dh

LILLICK & CHARLES

Attorneys at Law

Two Embarcadero Center
San Francisco, CA 94111-3996
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Cables LILLICKCHS

Telex TRT 184983

Facsimile
415 · 421 · 4799

Writer's Direct Dial Number

(415) 984-8348

October 23, 1995

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CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Ms. Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

John R. Schultz
Chief, District Operations
Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814-2724

Re: Draft EIS/EIR covering Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Dear Ms. Sahm and Mr. Schultz:

We are writing on behalf of our client, Endowment and Foundation Realty-JMB III and JMB Group Trust IV, the owners of One Maritime Plaza, San Francisco, California. We are writing to comment on the captioned EIS/EIR.

The EIS/EIR proposes five (5) alternatives for the roadway project. Two of the five alternatives propose the reopening of Davis Street between Clay and Washington Streets. This section of Davis Street has been closed for many years and is currently landscaped and used as part of the park on the adjacent block 203. We believe that a decision to reopen Davis Street is premature for several reasons.

11.1.2G First, the Davis Street right-of-way and the existing park on Block 203 are, at this time, essentially a unified whole. Development on Block 203 is currently being suggested by the CAO's Waterfront Transportation Projects Office. The shape of that development, its density and its likely setbacks have not yet been determined. Development of the street right-of-way may preclude alternative uses of the street right-of-way. For example, if the street right-of-way is incorporated into Block 203 so that there would be a larger lot for any potential development, any potential development on that enlarged lot would likely have a different footprint, and potentially a lower II-182 height, than would a development of Block 203 without the addition of all or part of the street right-of way.

Second, one of the mitigation measures suggested in the EIS/EIR to relieve traffic congestion on First Street and Battery Street is to divert traffic east on Clay to Davis so that traffic could then turn right on Davis Street and proceed across Market Street to access the freeway. [EIS/EIR page 297] The EIS/EIR does not adequately analyze the effect which reopening Davis Street might have on this mitigation measure.

Finally, the EIS/EIR does not address adequately the question of the effect which opening Davis Street would have on traffic congestion at various intersections in the area. Absent a showing that there would be any improvement, it seems unnecessary to reopen Davis Street at this time.

In view of the foregoing, we believe that any decision concerning the reopening of Davis Street should be postponed until more is known about the potential development of Blocks 202 and 203.

Respectfully Submitted,

LILLICK & CHARLES

Lee F. Gotshall-Maxon

cc: Timothy C. Noel, Heitman Properties, Ltd.

n\..\LTR\SAHM.LTR

Michael M. Levin
834 - 29th Avenue
San Francisco, CA 94121

October 22, 1995

Barbara W. Sahm, Environmental Review Officer
San Francisco Planning Dept.
1660 Mission Street
San Francisco, CA 94103

RECEIVED
OCT 23 1995
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Subject: DRAFT EIR/EIS 92.202E & 94.060
ALTERNATIVES TO REPLACEMENT OF THE EMBARCADERO FREEWAY
AND TERMINAL SEPARATOR STRUCTURE IN SAN FRANCISCO

As I mentioned at the Sept. 27 Public Hearing, the Draft EIR/EIS is somewhat lacking in graphic illustrations,--in particular, comparing the Split Roadway and Paired Roadway options in front of the Ferry Building.

The photographic illustrations in Figure 4.3-1 (page 237) II-264
11.7.2 should be replaced (or supplemented) by illustrations which
more clearly show the features of these 2 alternatives.
The existing trees, which block the view of the area in the
upper photo, should be eliminated from the picture.

The choice between these 2 options (within the major Alternatives) is critical and should be clearly shown and explained. Additional illustrations -- aerial as well as lower-level views -- could better show the nature of the 2 plaza spaces and their dimensions.

The text should set forth exactly how these two plazas would differ and the pros and cons of each. Particular attention should be paid to the nature of crossing the paired roadway for pedestrians, as compared with crossing just II-229
11.4.6 C one direction to get to the plaza in the split roadway design.

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One more point -- EIR's generally include a brief historical background which is useful for making decisions for the future. The Background section (1.2, pages 27-32) is incomplete -- it should include some earlier history, especially of the area in front of II-264
11.7.2 the Ferry Bldg. At the very least, there should be historic photographs of the front-of-Ferry-Bldg. area, showing the old streetcar turnaround, and also one showing the elevated freeway structure directly in front of the Ferry Bldg. (which would graphically support the decision not to rebuild such a structure!).

Thank you for considering these suggestions.

Michael M. Levin

MICHAEL M. LEVIN

SPUR

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Lori L. Yamauchi

James T. Chappell
Executive Director

October 23, 1995

Barbara W. Sahm
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103
via FAX 415 558 6409. Hard copy follows with attachment.

John R. Schultz
Federal Highway Administration
980 Ninth Street # 400
Sacramento, CA 95814
via FAX 916 498 5008. Hard copy follows with attachment.

RE: Draft Environmental Impact Statement/Report on Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

On October 18, 1995 the Board of Directors of SPUR considered the above referenced document. SPUR supports designating the DPT variant as the Locally Preferred Alternative with the following exceptions:

1. Unbundling of the Alternatives. SPUR recommends that consideration be given to "unbundling" the various disparate components of the alternatives (e.g., surface road changes, freeway
11.7.1 ramps, Embarcadero roadway, etc.) to the extent that they are not II-262
interdependent, so the public can comment on them individually.

2. The Bay Bridge ramps. (refer to Figure 2.4A, DPT Variant, from the subject document). Based on the analysis to date, SPUR supports the improvements labeled:

- 3 - widening of existing I-80 eastbound Fourth Street off-ramp and approach
- 6 - future conversion of Sterling Street on-ramp from PM peak period HOV operations to mixed flow operation (when warranted by congestion levels)
- 7 - future conversion of Essex Street on-ramp from PM peak period HOV operation (when warranted by congestion levels)

11.8

SPUR agrees with the Department of Parking and Traffic that this solution appears superior to the more extensive ramp proposals in alternatives 3 and 5. In no way should those alternatives be chosen and unneeded and undesirable ramps be constructed simply as an expedient to obtaining funding for improvements to the Embarcadero roadway. We understand that present thinking is that funding will be provided for the Embarcadero roadway without construction of the more extensive ramp structures in alternatives 3 and 5. Should this funding be denied, SPUR recommends that the matter be further pursued at the highest levels of the federal government to allow the DPT ramp alternatives and the Embarcadero roadway to be constructed. II-268

San Francisco Planning and Urban Research Association 312 Sutter Street, San Francisco 94108
Phone: (415) 781-8726 Facsimile: (415) 781-7291

3. The Fremont Street off-ramp. (refer to Figure 2-4A, DPT Variant, from the DEIS/DEIR). Based on analysis to date, SPUR is not convinced that reconstruction of the end portion of the Fremont Street off-ramp from the Bay Bridge is justified. CALTRANS has told us that the entire off-ramp, north-south above Essex Street and east-west between Folsom and Howard Streets, is seismically unsound and must be demolished. SPUR opposes the construction of such long mid-block elevated freeway structures in San Francisco, for seismic, aesthetic, land development potential, and environmental reasons. To build this "tail" on an elevated structure that will soon have to be demolished is questionable public policy. SPUR recommends instead that consideration be given to an alternative action described thusly:

11.1.2D - in the short run, Fremont Street be restriped between the off-ramp and Folsom Street. Fremont Street is two-way south of Folsom Street and one-way north of Folsom Street. By simply making this half-block north of Folsom two-way also and with proper timing of traffic lights, we believe traffic could smoothly flow off the ramp to Folsom street, and turn left on Folsom. II-179

- in the long run, when the entire ramp is demolished, we believe that it is not desirable that it be rebuilt mid-block between Folsom and Howard, with all its negative land use impacts. Rather serious consideration should be given to bringing the ramp down to Folsom Street as quickly as possible. We believe it is possible to ramp down on the south side of Folsom Street within what are acceptable community standards for an urban roadway in San Francisco. Maximizing development potential of scarce lands, minimizing elevated structures in this valuable urban area, and minimizing environmental impacts must be important criteria in any design decisions. SPUR is mailing you a copy of our report Transbay District Neighborhood Vision which we have prepared as a conceptual guideline to rethinking this entire San Francisco neighborhood. Please note that in this scheme, the subject automobile ramp is brought down to the south side of Folsom Street. A bus ramp to an underground transit terminal at the site of the present Transbay Terminal goes underground as quickly as grades permit.

4. Access to Chinatown and North Beach. SPUR believes that continued study is necessary to facilitate the flow of people (not just automobiles) into these important shopping, dining and tourist destinations. In light of the construction of the F-line and attendant landscape improvements along the Embarcadero, we believe that alternatives should be considered which would encourage the flow of people from the F-line to these destinations in the area between Washington Street and Broadway. We recommend that urban design and public transit alternatives be considered that would encourage the transfer II-170 11.1.1A of both tourists and residents to and from the F-line and east-west transit lines in this area. Such connections need not be elaborate or capital intensive if properly conceived and designed but could fulfill a real urban design and transportation function. At the simplest level, a landscaped plaza with a bus shelter and signage would help meet the need. In addition, redesign and reuse of blocks 202-203 could have visitor-oriented uses to channel visitors into the Chinatown-North Beach neighborhoods. Other alternatives suggested by Chinatown advocates and worthy of study include extension of the 83 Pacific bus line to the Embarcadero and upgraded service on Columbus Avenue.

We appreciate the opportunity to comment on this DEIS/DEIR and would be happy to meet with your team to further discuss our concerns and ideas.

Sincerely,

James T Chappell

James T. Chappell
Executive Director

Attachment (hard copy)

ED LTR 10 23 95 1

11. RESPONSES TO ORAL AND WRITTEN COMMENTS ORGANIZED BY TOPIC

As explained in the Introduction to this volume, responses to all oral and written comments received on the Draft EIS/EIR are grouped into eight general categories. Within these categories, responses are further grouped by subject matter. Their organization does not precisely mirror the Table of Contents in the Final EIS/EIR, but was suggested by the number and variety of the comments themselves. Because these categories overlap to some extent, commenters and decision-makers should refer to the comments in Section 9, Oral Comments Received at Public Hearings, and Section 10, Comment Letters, in order to find specific responses. For readers who are not seeking responses to specific comments, a review of the Table of Contents will provide the best orientation to this volume. Abbreviations referencing the names of individuals and organizations commenting can be found in Section 8, List of Agencies and Individuals Commenting on the Draft EIS/EIR.

11.1 Responses to Comments on the Scope of the Project, the Definition of Project Alternatives, and the Project Purpose and Need

In addition to commenting on the potential environmental effects of the project and the environmental analysis contained in the Draft EIS/EIR, many individuals and organizations commented on the overall scope of the project and on the definition of project alternatives. Responses to these comments are provided in three groups, below: a group which focuses on traffic problems in Chinatown; a group which focuses on proposed modifications to project alternatives; and a group which addresses other comments regarding the general scope of the project and the project's stated purpose. Comments which express preference for or disfavor with one alternative or another, but do not propose project modifications or directly address the overall scope of the project, are responded to in Section 11.8, Responses to Preferences Expressed Regarding Alternatives.

11.1.1 The Project Should Address Traffic Problems in Chinatown

A. Improve Regional Access to Chinatown and Include Solutions to Traffic Problems in Chinatown, Including Transit Connections (SPUR, CRC, Hestor, Mah, Chinatown TRIP, Chung)

As referenced by the commenter (Hestor), and stated on page 37 of the EIS/EIR, one of the purposes of the project titled "Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure" is "to restore local and regional transportation connectivity affected by the 1989 Loma Prieta Earthquake and the loss of the Embarcadero Freeway and TSS." Recognizing the lack of public sentiment for reconstructing elevated freeway structures, California Senate Bill 181 (Kopp, 1991) specifically referred to a "system of ramps and city streets that would essentially provide motorists with accessibility comparable to that provided by Route 480."

It is this "system of ramps and city streets" that is proposed in Alternative Three, Alternative Five, and the Preferred Alternative (DPT Variant), all of which have been determined to essentially provide "comparable accessibility," and to therefore be eligible for Federal Emergency Relief funds.[2]

When the traffic analysis results of the No Build are compared with the results of Alternative Three, Alternative Five, and the Preferred Alternative, it is clear that ramp improvements and surface street improvements proposed along the Embarcadero, combined with street and operational improvements within the downtown area, would improve local accessibility along the waterfront, to and from the freeway, and to and from neighborhoods in the northeast sector of the City. As shown in Table 4.5-1 in the EIS/EIR (page 268), the number of vehicles accessing the primary study area would increase marginally (from 51,240 vehicles in the No Build, to about 52,160), while the vehicle miles traveled and vehicle hours traveled would decrease (from 40,150 miles and 2,890 hours in the No Build, to about 38,990 miles, and about 2,780 to 2,840 hours). These decreases would occur due to the availability of more direct routes, to increases in capacity along sections of important local corridors such as Third, First, and Fremont Streets, and to operational changes that would make traffic flow better on existing streets.

Regional accessibility would be improved by the same build alternatives to the extent feasible, given that capacity constraints on local freeways exist outside the downtown area (i.e. the Bay Bridge and Hospital Curve or the I-80/US 101 merge). As shown in Table 4.5-6 in the EIS/EIR (page 297), the demand-to-capacity ratio of off-ramps in the study area would improve from 1.02 and .68 (AM and PM) under the No Build, to .88 and .60 under the Fourth Street Option of Alternatives Three and Five and the Preferred Alternative.

All of these improvements would facilitate access and traffic flow, "restoring" accessibility to the extent feasible with "an alternate system of ramps and city streets," but would not wholly relieve traffic congestion in densely urban downtown San Francisco and Chinatown. It would be unrealistic to expect that any transportation project (even rebuilding the Embarcadero Freeway or instituting major new public transit facilities) would wholly relieve congestion that is due in part to the density of population and employment, narrow streets, the availability of parking, and entrenched personal habits common to many Californians in the 1990s.

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[2] Fred Hempel, Division Administrator of the Federal Highway Administration, Letter to James W van Loben Sels, Director of Caltrans, April 26, 1995. and Fred Hempel, Division Administrator of the Federal Highway Administration, Letter to Joe Browne, District Director, Caltrans District 4, January 26, 1996.

Responding further to these comments, the City initiated a study of the concerns and issues of the Chinatown community. This study, documented in the Chinatown Area Transportation Study (Final Report, July 1, 1996) presents the issues and concerns raised by the community during ten small working group sessions and three publicly noticed meetings, evaluates traffic, transit, parking and pedestrian conditions, identifies anticipated future year 2015 conditions, and presents recommendations for improvements. Based on the results of the study, an Improvement Program for the Chinatown/North Beach area was developed by City staff. A summary of this supplemental study and the recommended improvement program is presented in response 11.4.1, pp. II-200 to II-208.

(Hestor) Information about how the Second Street ramps proposed in the Second Street Option of Alternatives Three and Five would affect traffic patterns north of Market Street can be gleaned from a comparison of Alternative Three and Alternative Four. As shown in the Table 4.5-12 of the EIS/EIR (page 324), the level of service at north of Market intersections would be the same at most locations. Also see Table 4.5-3 of the EIS/EIR (page 289), Table 4.5-4 of the EIS/EIR (page 291), and Section 2.5.4 of the background Transportation Technical Report, which is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street.

B. Earlier Suggestions, Including Intercept Parking, were Improperly Dismissed (Schmaltz, CRC, Hestor, Queen)

(Queen) As stated on page 120 of the EIS/EIR, a great many ideas were considered in the development of alternative replacement concepts for the Embarcadero Freeway. The vast majority of these ideas were either variations on one or more of the project alternatives, or ideas which focused primarily on urban design issues. Several other ideas were either not discussed at length by the Citizens Advisory Committee for the Embarcadero Project (CACEP) because of an obvious lack of support from participants, or were discussed but not recommended for further analysis. Section 2.1.1 of the EIS/EIR (pages 48-52) describes the lengthy public participation process involved in developing Embarcadero alternatives.

Reconstruction of the elevated Embarcadero Freeway or construction of an alternative elevated roadway structure was not considered by the CACEP, because of an obvious lack of support from participants. Nonetheless, an elevated single-level roadway alternative was suggested by one commenter during the public scoping process for the EIS/EIR. This idea was considered by City staff and rejected as a viable alternative for a number of reasons. As referenced on pages 52 and 122 of the EIS/EIR, among the reasons for rejection of the single-level elevated roadway concept, was the lack of public support. Only one individual other than the commenter voiced support for the concept orally at the scoping meetings; also no individuals other than the commenter submitted written materials in support of the concept, and a typed list of names rather than a petition of signatures was presented. Another reason the single-level elevated roadway concept was rejected as a viable alternative, was that it would conflict with the project's purpose and need, which includes maximizing visual access between downtown San Francisco and the waterfront. (See EIS/EIR Section 1.4, pages 37-/39.)

(CRC, Hestor) The provision of an intercept parking garage adjacent to the I-80/U.S. 101 freeway off-ramps, combined with transit service to Chinatown was evaluated. The concept of an intercept facility is often used at the periphery of congested urbanized areas to meet the needs of long-distance commuters. These facilities (generally park-n-ride lots) attract commuters who would otherwise drive to their destinations and are likely to reduce the number of vehicles on congested roadways and freeways. For the commuters the attraction is to transfer to public transit or rideshare vehicles in advance of congestion points for convenience and possible reduced travel times. The response to Comment 11.4.1 on page II-200 presents the travel times for routes between the regional freeways and the intersection of Stockton/Broadway in Chinatown. The travel times represent only a small component of the total time for travelers accessing Chinatown and using I-80 and U.S. 101.

An intercept facility adjacent to the ramps would not relieve visitors to Chinatown from the congestion on the freeways and therefore the major attraction for using an intercept garage would be eliminated. The travel time between the intercept facility and Chinatown would be longer than parking as close to Chinatown in facilities with available capacity (i.e., St. Mary's, Golden Gateway) and utilizing a shuttle or transit to the final destination. In the supplemental Chinatown study, the parking supply that is currently available to Chinatown visitors was evaluated and it was recommended that improvements to the parking facilities in or near Chinatown be pursued prior to construction or use of intercept parking facilities. (Please see Response 11.4.1, pp II-206 to II-207, for parking elements of the recommended improvement program.)

(Schmaltz) As discussed in the response immediately above, an intercept parking location that must rely on connecting transit service traveling on congested City streets to bring commuters to their destinations, would not be effective. The available parking supply in the South of Market Street area already functions as intercept parking facilities for commuters having destinations within walking distance from these facilities. The need for an underground intercept parking facility at the location suggested by the commenter would depend on future developments in the vicinity of the site and availability of the site.

C. Maintain Right-of-Way for Transit Loops where Freeway Ramps have been Removed (Hestor)

As described on pages 241-245 of the EIS/EIR, all project alternatives would not use certain parcels that were formerly occupied by the Embarcadero Freeway ramps or Terminal Separator Structure. These parcels would be available for other uses, and the EIS/EIR assumes commercial development on these sites in order to present a reasonable "worst case" in terms of cumulative impacts. The current project does not propose development on these sites however, and additional approvals, with related reviews and public input, would be required prior to any development.

While it would be impossible to predict exactly what reuse strategy will ultimately be adopted for each available parcel, and what the timing of related reviews/approvals would be, the San Francisco Board of Supervisors has required that sale of the parcels along Broadway not to occur until after completion of this EIS/EIR. A planning process is currently underway with regards to those parcels.

In regards to Assessor's Blocks 202 and 203, near Clay and Washington Streets, a planning process is also underway, and separate environmental review is being conducted to analyze potential impacts of development alternatives, rezoning, and redevelopment strategies. Also, in response to community concerns and input during the supplemental Chinatown analysis referred to in the responses immediately above, the current project would reserve a strip of right-of-way along the Washington Street side of Assessor's Block 203 (between Drumm and Davis Streets) to accommodate a potential surface rail extension until a final decision is reached with regards to that proposal. It should be noted that the former Embarcadero freeway on- and off-ramps occupied approximately 16 feet each of the parcel along Clay and Washington Streets. The parcel also houses an abandoned pumping station under the jurisdiction of the Clean Water Enterprises. At present there is no use proposed for this abandoned facility.

The South of Market Street parcels made available by removal of the TSS are still owned by Caltrans, which has participated in feasibility planning regarding possible relocation of the Transbay Terminal to one of the vacant sites. It is unclear whether Caltrans would agree to reserve rail right-of-way prior to construction of a terminal, or prior to sale or transfer of their properties.

D. No Alternatives Address Chinatown Needs/Consider only Alternatives that Improve Traffic Flow and Decrease Travel time to Chinatown (Chinatown TRIP, CRC, Chung)

All build alternatives include alignment and operational improvements along The Embarcadero, as well as a package of design and operational improvements on surface streets in the vicinity of the proposed project. (See Section 2.2 of the EIS/EIR for a description of the proposed improvements under each build alternative.) These improvements are being proposed, not only to facilitate access to the regional transportation network, but also to improve traffic flow on surface streets and improve access to neighborhoods adjacent to the proposed project.

See also Response 11.4.1 on page II-200 to II-208, which discusses access to Chinatown, additional features included in the Preferred Alternative regarding access to Chinatown, and interim measures to be implemented by the City.

11.1.2 Other Proposed Modifications/Additions to the Project

A. Consider Depressing or Undergrounding the Embarcadero Roadway (SFT, Maletic, Bird, Ciampi, Unobskey, Levin)

(All Commenters) As stated on pages 123-125 of the EIS/EIR, earlier proposals to place the entire width of the Embarcadero roadway or the northbound lanes of the Embarcadero roadway underground in front of the Ferry Building were eliminated from consideration because of physical and operational constraints, high cost, and the potential that these schemes would restrict, rather than enhance, pedestrian movements in the vicinity. Specifically, the "short tunnel option" was rejected because the two ramp segments that would bring the northbound roadway underneath the plaza area, would restrict pedestrian movement across the Embarcadero for about 140 meters (450 feet) on either side of the plaza and would introduce a new physical barrier to crossing The Embarcadero. Also, the underground section was estimated to add $60-80 million to the cost of the project, while it would eliminate only one traffic signal for northbound traffic, and one three-lane crossing for pedestrians in front of the Ferry Building.

Resolution #262-90 passed by the Board of Supervisors on February 19, 1994, dropped the underground alternative (Alt. 6) from further consideration in the EIR/EIS. (7 ayes - Bierman, Hscih, Kennedy, Lea, Maher, Migden, Shelley; 2 noes - Alioto, Hallinan; and 2 absents - Conroy and Kaufman). The rationale for originally dropping the underground includes the following:

- Required substantial excavation and soil stabilization work to: remove and reconstruct a BART tube stabilization platform approximately 3 feet underground, remove freeway footings, remove old underground roadway which was previously filled, stabilize the seawall and Ferry Building given the proximity of excavation work.
- Significant excavation would require more significant hazardous waste disposal, archaeological oversight, and dewatering measures.
- The creation of a 350' plaza in front of the Ferry Building would have required the creation of 450' trenches at either end of the Ferry Building. This would introduce a visual and physical barrier to the waterfront similar to that which existed with the elevated freeway.
- The elimination of the existing heavily used pedestrian crossings at the north and south end of the Ferry Building, reduces the accessibility to the waterfront and ferry service.
- Traffic advantages gained, 2-4 minute reduction of travel time with a partial underground and full TSS ramp reconstruction, did not outweigh the negative impacts of underground construction.
- Costs were prohibitive, total costs ranged from $112 to $181 million for a comparable northbound underground roadway in 1992. Available ER Funds for the Mid-Embarcadero were set at $58.5 million. (Assumed to cover approximately 75% of the cost with the remainder to come from local and state sources.)
- Delays in project delivery - Delivery date for a partially subsurface alternative was estimated at mid-2001.

(Ciampi) The alternative proposed by Mr. Mario Ciampi would place both the northbound and southbound lanes of traffic along the Embarcadero about 4.5 meters (15 feet) below grade, while elevating the pedestrian crossing along the centerline of the Ferry Building about 1.5 meters (five feet). This suggestion would essentially create a hybrid between a fully subsurface roadway, and a surface roadway with an "overpass." An analysis of this proposal by project engineers concluded that it incorrectly illustrates the amount of land available at Mission/Embarcadero by about 12 meters (40 feet). Without this "land," the alternative cannot provide vehicular access for Ferry Plaza (behind the Ferry Building), or for the Ferry Building itself. (A service roadway would not "fit" next to the depressed roadway and F-Line tracks.)

While the proposal has certain advantages, such as providing an exclusive pedestrian crossing of the Embarcadero at the center line of the Ferry Building, it would also have the following disadvantages:

- The mid-block pedestrian crossings opposite the wings of the Ferry Building could not be provided as proposed in other alternatives;
- Sight-distance constraints would be on the borderline of what would be acceptable for a 72 kph (45 mph) design speed and posting of the project at 56 kph (35 mph).[3]
- Cost of underground is estimated at approximately $119, inclusive of the port parking garage. The cap of $58.5 million has not changed.
- Delays to the project, including the F-Line, are estimated at 2 years (environmental - 9 months, design - 6 months, and construction 10 months) extending completion in mid-1999 to completion in mid-2001.
- Technical and aesthetic issues associated with the original underground proposals all still exist.

(Maletic) A similar proposal, suggested by the San Francisco Art Commission, would put the northbound lanes of the Embarcadero Roadway underground in front of the Ferry Building. This proposal would have the following disadvantages: the mid-block pedestrian crossings opposite the wings of the Ferry Building could not be provided as proposed in other alternatives, unless the vertical grades exceeded Caltrans' standard of 8%; sight-distance constraints would make a 72 kph (45 mph) design speed and a posted speed of 56 kph (35 mph) infeasible.[4]

B. Changes to Bryant Street and Pedestrian Improvements on Second Street (Design)

The Sterling Street eastbound on-ramp capacity is limited not by the number of lanes feeding into it but rather by the merge lane configuration on the Bay Bridge (the vehicles entering the freeway have to merge with those traveling on the right-most lane on the Bay Bridge). The maximum capacity of the on-ramp is therefore estimated at 1,000 vehicles per hour, which would not change even if Rincon Street and the old Embarcadero Freeway fly-over connection were used to access the Bridge. (It is unclear if this may even be structurally feasible.)

Providing two westbound lanes on Bryant Street from The Embarcadero to Sterling Street and maintaining one eastbound lane between Second Street and Beale Street would require elimination of parking on the south side of Bryant Street without relieving traffic congestion in the vicinity of the on-ramp (the ramp capacity would remain at 1,000 vehicles per hour). In addition, this configuration would create substantial out-of-way travel for those vehicles (especially carpools and vanpools) whose trip originates south of Bryant Street and west of Second Street and are bound for the East Bay. These vehicles would be forced to turn left or right at Second Street and continue east either on Brannan Street to The Embarcadero and return along Bryant Street or on Folsom Street and turn at Essex Street (Harrsion Street would be a one-way street west of First Street under Alternative Three, Four and Five.)

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[3] John Thomas, Project Engineer, Memorandum to Rebecca Kohlstrand, January 17, 1996. A copy of this memo is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street.

[4] Ibid.

This lane configuration would most likely result in the underutilization of the Sterling Street on-ramp and additional traffic congestion at the remaining ramps. Under those alternatives that consider the Sterling Street on-ramp a carpool-only freeway access during the PM peak hour period, the out-of-way travel via Brannan Street and The Embarcadero would be of almost one mile.

C. Extend Essex Street to Howard Street (Schmaltz, Chappell)

The Essex Street right-of-way between Folsom and Howard Streets is currently occupied by a ramp connecting the surface street network to the elevated bus ramps of the Transbay Terminal. This connection is used by some buses accessing the elevated ramps for layover periods, and is available in case of temporary re-routings and emergencies. Prior to a decision regarding the ultimate fate of the Transbay Terminal and associated ramps, it would be premature to propose elimination of this connection. Nonetheless, the extension of Essex Street between Folsom and Howard Streets is recognized by the San Francisco Planning Department, and Planning Commission Resolution Number 13970, adopted October 12, 1995, states that "extension of Essex Street . . . would alleviate traffic congestion on First Street." Given this recognition, it is likely that the one block extension of Essex Street, whether on the surface or by a grade separated right-of-way as suggested by the commenter, will be proposed for analysis and implementation as part of a new Transbay Terminal and/or the retrofit of existing Transbay Terminal ramps.

(Schmaltz) Please note that the PM Peak Hour on-ramp capacity to I-80 eastbound at Essex Street is about 1,700 vehicles per hour. PM Peak Hour demand for this on-ramp is currently 1,780 vehicles per hour, and is projected to be about 1,050 vehicles per hour (HOV) in 2015. Extending Essex Street one block to Howard Street, whether at grade or on a grade-separated structure, would add queuing space, but would not increase the capacity of this on-ramp. About 1,930 vehicles per hour currently use the First Street on-ramp in the PM Peak Hour, and if this ramp were closed as suggested by one commenter, these vehicles would be forced to use Essex, Sterling, or ramps farther west. Given these existing and projected future traffic volumes, congestion levels and queuing on local streets would probably exceed amounts that would occur under all project alternatives, including the No Build, and would likely be shifted off of First Street and to the west.

D. Shorten the Fremont Street Off-Ramp or Omit Proposed Modifications to the Ramp (SPUR, Schmaltz, Alexander, Bement, Manus, Chappell)

(Bement) The existing Fremont Street off-ramp from the Bay Bridge (I-80 westbound) would be modified to touch-down at the intersection of Fremont and Folsom Streets under Alternatives Three, Four, Five, and the Preferred Alternative. As described on page 254 of the EIS/EIR, and shown in Figure 4.2-2 (page 257), the modified ramp would either remove the existing ramp-end and build a four-lane flared touch down at the corner, or would leave the existing ramp-end and build a one or two lane extension to the corner. This project feature is estimated to cost approximately $5 million, and would facilitate use of Folsom Street as a regional connection to the Embarcadero and the northeastern quadrant of the City. Folsom Street is already a busy thoroughfare, with up to four eastbound lanes. Pedestrian use of this street is limited east of where the modified off-ramp would touch-down (e.g. at Fremont and Main Street crosswalks, which have 45-160 pedestrians per hour at peak times) when compared to areas west of the proposed off-ramp modifications (e.g. at Second Street crosswalks, which have 320-550 pedestrians per hour at peak times). While traffic volumes on Folsom Street are projected to rise (from 990 vehicles per hour in the AM peak under existing conditions, to 1,380 vehicles per hour under the No Build, and 1,630 vehicles per hour under the Preferred Alternative), no potential increase in pedestrian/automobile conflicts or other pedestrian safety problems have been identified.[5]

The Transportation Element of the City's Master Plan identifies Folsom Street as a Major Arterial, and not a Citywide Pedestrian or Neighborhood Pedestrian Network Street. However, this does not mean that it is necessarily unsuitable for, or incompatible with residential development. There are several streets in San Francisco which are classified as Major Arterials, but which also are developed with high density residential uses (e.g., Van Ness Avenue, The Embarcadero at South Beach). Policy 18.1 of the Transportation Element acknowledges that many major arterials in San Francisco have to double as residential streets because there are no real alternatives, and calls for buffering traffic impacts with medians and landscaping.

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[5] For pedestrian volumes, see the Transportation Technical Report cited on pp. 265 of the EIS/EIR Projected traffic volumes and traffic speeds on selected links are inherent in the NETSIM traffic simulation model referenced on p 267 of the EIS/EIR Printed results are available for public review in the project case file, at the San Francisco Planning Department

(SPUR, Chappell) Similar to the ramp-modifications proposed, re-striping Fremont Street to allow traffic to exit the existing ramp, turn south, and then east, would facilitate the use of Folsom Street. This re-striping would not simultaneously add queuing room on the ramp however, and was rejected by the City's Department of Parking and Traffic as a temporary "fix" because it could result in queues on the ramp that would block bus access to the Transbay Terminal.[6] The modified ramp would also have the advantage that it would align drivers exiting the freeway with the waterfront, aiding perceptions of accessibility to the Embarcadero and the northeast quadrant of the City.

(Alexander, Schmaltz, SPUR, Manus, Chappell) As described on page 110 of the EIS/EIR, Caltrans plans to seismically retrofit the Bay Bridge and the west approach to the Bridge (I-80). To reflect current plans, the discussion of the retrofit project has been modified and expanded to read as follows:

> The California Department of Transportation (Caltrans) plans to retrofit (seismically) five toll bridges in the San Francisco Bay Area. In the area of the proposed project, the SF-Oakland Bay Bridge (SFOBB) and its elevated West Approach would be retrofitted to withstand a maximum credible earthquake under Caltran's Seismic Retrofit Strategy for SFOBB. The limits of the West Approach are from the west anchorage of the SFOBB to the Fifth Street on-and off-ramps. The limits also include the Fremont Street westbound upperdeck off-ramps. As part of Caltran's Seismic Retrofit Strategy for the entire SFOBB the West Approach structures will be replaced in order to meet the serviceability criteria. This project is currently under design with construction expected to begin in spring 1998. The construction period will be approximately four years.
>
> In addition to the West Approach project, the Bayshore structures on Interstate 80 from Fifth Street to the Route 101 interchange are also being retrofitted as part of the Phase 2 Seismic Retrofit program. The structures are being designed for a "Non-Collapse" criteria. The Bayshore Retrofit project is broken into three distinct elements; (1) from Bryant (8th) Street to 6th Street, (2) from 6th Street to 4th Street and (3) from 16th Street to 8th Street. All work is to be done under the structures; mainly strengthening columns, bents, girders, and foundations. These elements are currently under design with construction expected to begin late 1996 or early 1997. The construction duration will be approximately two years.

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[6] Jack Fleck, San Francisco Department of Parking and Traffic. Phone conversation, January 11, 1996

> Design and construction of new or modification of existing freeway on- and off-ramps and widening of the I-80 freeway, proposed under the build alternatives, would be undertaken by Caltrans and incorporated into Caltrans seismic retrofit work in the project area.

Caltrans has determined, based on preliminary cost estimates, that removing the existing Transbay Terminal ramps, including the automobile ramp to Fremont Street, and replacing them would be less expensive than retrofitting the existing structures. Thus, a new ramp-configuration could be constructed as part of the retrofit project, and it might be possible to construct a shorter automobile ramp, which would touch-down on the south side of Folsom Street, west of First Street. As described in a letter from San Francisco Mayor Frank Jordan to Joe Browne of Caltrans dated October 23, 1995, the City's Department of Parking and Traffic analyzed this possibility and found several disadvantages. First, the left turn demand at Fremont Street in the AM Peak would require four turning lanes, an "unprecedented and inadvisable scheme." Second, there would be only about 61 meters (200 feet) of queuing room between the First and Folsom intersection and the ramp touch-down -- even with six lanes of traffic, in the AM Peak, this area would "quickly fill up with cars and begin to back up onto the off-ramp." Thirdly, in the PM Peak, the introduction of higher traffic volumes on Folsom Street, would have the potential to affect cross-traffic bound for the Bay Bridge via First Street. Based on these and other considerations, the Department of Parking and Traffic concluded that the modification of the Fremont Street off-ramp proposed in Alternatives Three, Four, Five and the Preferred Alternative should remain as originally defined, and that a shorter ramp, with "potentially severe" problems should not be introduced as an alternative.[7] (See Response 11.3.7, below, regarding the Transbay Terminal and associated ramps.)

E. Relocate the Second Street On-Ramp (Chester)

A direct on-ramp connection from Second Street to I-80 westbound has been investigated during conceptual engineering of the build alternatives. However, it was found geometrically infeasible because the grade required of the ramp would exceed the maximum 8% allowed by Caltrans. For this reason, a new on-ramp at Second/Harrison Streets was rejected.

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[7] Mayor Frank M. Jordan, October 23, 1995 Letter to Joe Browne, Director of Caltrans District Four, and attached memoranda from Jack Fleck of the Department of Parking and Traffic dated September 12, 1995 and September 15, 1995 A copy of this letter and attachment are available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

F. Re-examine Carpool Lanes on the Essex and Sterling Street Ramps (Schmaltz, Chester)

(Schmaltz) The PM peak hour carpool demand in future year 2015 was estimated using the Metropolitan Transportation Commission travel forecasting model. According to that source, up to 1,050 vehicles would use the I-80 eastbound carpool on-ramp in the PM peak hour by 2015. This projection assumes that by provision of an HOV ramp, commuters would be encouraged to carpool in higher numbers, in both directions, especially once the HOV facilities on I-80 in both directions between the Bay Bridge and the Carquinez Bridge are fully operational.

(Chester) In 1993, KORVE Engineering, Inc. conducted preliminary estimates of the increase in HOV vehicle demand from downtown San Francisco to the East Bay during the PM peak hour. According to those estimates, the number of HOV vehicles would increase from approximately 650 vehicles under Alternatives One or Two, to about 1,050 vehicles under Alternatives Three, Four and Five (a 60% increase). This projected increase is attributed to improvements in accessibility for HOV drivers, who would be able to use an HOV ramp on the north side of the Bay Bridge. The Preferred Alternative allows flexibility in implementation of HOV shifts.

G. Opening Davis Street to Vehicular Traffic (GGC, Lillick & Charles, Chester)

(Chester) The Davis Street right-of-way, between Clay and Washington Streets, currently functions as a pedestrian pathway. Although the right-of-way is landscaped and is contiguous with open space on Assessor's Block 203, it is not part of any park, and remains a mapped, but unimproved, street. Potential future development on Block 203 would benefit, in terms of local accessibility, from opening this street to traffic.

The opening of Davis Street to automobile traffic between Clay and Washington Streets evolved as part of the alternative development process during 1993 and 1994. At that time it was thought that those alternatives attracting more vehicles into the study area would benefit from the increase in accessibility provided by connecting Davis Street with Washington Street. This does not mean that the opening of Davis Street could not be implemented under Alternatives Two or Four if so desired.

(Lillick & Charles, GGC) The mitigated traffic analysis conducted on pages 323 through 328 of the EIS/EIR incorporates the opening of Davis Street for Alternatives Three, Five and the Preferred Alternative. Therefore, the levels of service shown at intersections in that area (i.e., Davis Street/Sacramento Street, Davis Street/California Street, or Market Street/Beale Street) already account for the opening of Davis Street under these alternatives. As Table 4.5-12 on page 324 of the EIS/EIR indicates, congestion levels on Davis Street would be very light during both the AM and the PM peak hours (LOS A or B). Noise and air quality analyses performed do not predict unusual or unacceptable noise levels or air quality exceedances in the area under alternatives which propose opening Davis Street to automobile traffic.

As with any feature of the build alternatives, members of the public and decision makers may weigh the benefits of the feature (i.e. increased local accessibility) against perceived drawbacks (i.e. loss of the landscaped path).

H. Left Turn Lanes and the "Widening" of Washington Street (GGC, Walters, Bird)

(Walters, GGC) The proposed improvement on Washington Street between Drumm Street and The Embarcadero is to restripe the existing street width to provide two travel lanes in each direction (as opposed to one wide lane in each direction currently). The proposed improvement would not require widening of Washington Street, and would both accommodate double left turns from northbound Embarcadero and improve traffic flow at the intersection of Washington Street and The Embarcadero. Under all build alternatives, pedestrians crossing Washington Street adjacent to the Golden Gateway Center would have to cross the same physical distance as they cross today. Traffic volumes would be higher (from 530 vehicles per hour in the PM peak under existing conditions, to 770 vehicles per hour in the no build, and 1,050 vehicles per hour in the Preferred Alternative), with traffic speeds projected to decrease slightly. Adjacent intersections would operate at LOS B or C. (See Table 4.5-12, page 324 of the EIS/EIR.) It should be noted however, the reservation of right-of-way on Washington Street to accommodate future rail service as requested by Chinatown would require widening the street by approximately 5.5 meters (18 feet) on the block between Drumm and Davis Streets. The widening would occur on the south side of the street in the area previously occupied by the freeway ramp and the abandoned pump station.

(Bird) In response to concerns expressed by the Chinatown community, the preliminary design of all build alternatives has been modified to include two left turn lanes (instead of one) from the Embarcadero northbound onto Washington Street westbound.

I. Add More Southbound Lanes on the Embarcadero (Schmaltz)

The South Embarcadero traffic capacity used in this study is consistent with the lane configuration that has already been built, i.e., mostly two lanes with turn lanes in both directions south of Mission Street Modifications to the recently completed South Embarcadero Project (south of Folsom) is beyond the scope of the current project. Also, some of the recent congestion in this area is attributable to ongoing construction of the Muni Metro Turnaround.

J. Add Class One and Two Bicycle Lanes (Poschmann, Means)

(Means) All build alternatives would construct Class Three bicycle lanes along the Embarcadero between Folsom Street and Broadway. Class Three lanes are identified by signs, but not by pavement markings, and are consistent with the treatment on the North and South Embarcadero. As stated on page 375 of the EIS/EIR, the outside vehicle lane in each direction on the Embarcadero would be 4.5 meters (15 feet) wide to provide the extra width required for bicyclists. During commute hours, these lanes would provide 3.3 meters (11 feet) of width for auto travel plus 1.2 meters (four feet) for bicycles. During midday, these lanes would provide 2.4 meters (8 feet) of width for parking, leaving 2.1 meters (7 feet) for bicycle use. Because curb lanes would alternate between traffic and parking, the bicycle lanes could not be striped. Provision of bicycle lanes of any kind would represent an improvement over existing conditions, because in one commenter's words, "the Embarcadero already has . . . substandard amenities for cyclists."

(Poschman, Means) Construction of Class One and Class Two bicycle lanes along the Embarcadero would only be possible if project alternatives were redefined to eliminate peak period traffic use of the curb lanes and off-peak curb-side parking, or if the width of proposed pedestrian facilities (the bayside promenade and the land side sidewalk) were substantially reduced in width. The use of curb lanes for automobile traffic is required in order to accommodate existing and projected peak period traffic volumes. Also, off-peak curb-side parking is proposed along both sides of the Embarcadero roadway under all build alternatives, except in areas where parking along the northbound lanes would conflict with view corridors to the waterfront. Staff of the Port of San Francisco have consistently advocated in favor of this parking, and it is doubtful whether the Port Commission would approve the project if it were redefined to eliminate curb-side parking. Changes to the Bay Bridge are beyond the scope of the current project.

11.1.3 Other Comments Regarding the Scope of the Project and the Project Purpose and Need

A. Expand the Project Purpose and Need (Schmaltz)

Several factors contributed to development of the project purpose and need, as stated in Section One of the EIS/EIR (pages 37-47). First, the Loma Prieta earthquake provided the City with the opportunity to evaluate the role of the Embarcadero Freeway and the Terminal Separator Structure in serving local and regional traffic. Second, emergency relief funds were made available to alternatives which would provide "comparable service" to pre-quake facilities, and third, Caltrans and FHWA agreed to participate with the City in analyzing potential alternatives to in-kind replacements of the pre-quake facilities. Funding for the analysis was made available from emergency relief funds, and the project purpose was therefore defined to include "restoring local and regional transportation connectivity." Recognizing that citizens of San Francisco would not support rebuilding massive elevated freeway structures, the project purpose also included "taking advantage of surface streets and transit to accommodate travel demand." (See page 37 of the EIS/EIR.) This last statement is broad enough to encompass the commenter's three suggestions regarding the distribution and separation of traffic on freeway ramps and surface streets. Also, the project clearly focuses on providing regional transportation access, including automobile access by commuters, as efficiently as possible, "with minimum queuing" on City streets.

The opportunity to plan for land uses, future development, and changes in the project area un-related to the earthquake-damaged transportation facilities, is clearly informed by changes in vehicle access, travel patterns, and the potential availability of vacant former-freeway parcels. Nonetheless, the opportunity to plan for the area existed prior to the earthquake (e.g. the City's Downtown Plan and the South of Market Plan), still exists, and is not precluded by the analysis of Alternatives to the Embarcadero Freeway and the Terminal Separator Structure. To "professionally analyze" issues other than transportation access (i.e. land uses or potential future development) would be clearly beyond the scope of the emergency relief funding identified for the current environmental analysis. Other funding sources are available for these studies, and members of the public are encouraged to participate in planning for the Transbay Area Plan, which is currently being developed by the San Francisco Planning Department. Comments addressing features of the project alternatives and the location of future traffic congestion, are addressed by topic in the sections which follow.

Just as certain planning activities are beyond the scope of the current analysis, certain transportation-related changes are beyond the scope of what can be accomplished by the current project. For example, raising the tolls on the Bay Bridge, while likely to affect regional travel patterns and therefore projected future traffic volumes in downtown San Francisco, is not something that could be accomplished in the context of the current project. Raising bridge tolls is a potentially controversial suggestion that should be directed to the Metropolitan Transportation Commission.

B. There is no Need for the Second Street On-Ramp (Clocktower, Design, Bird, Paglietti, Baldwin, Lowe, Gott, Hempel, Chappell, SOMA Rose, Chow, Kaliski, Koga)

The Second Street on-ramp proposed in Alternatives Three and Five would be accessed from Harrison Street, slightly east of Second Street, and would cross over Second Street to join the mainline freeway. It is estimated that the new ramp would provide additional on-ramp capacity of approximately 900 vehicles per hour in the westbound direction. (The new on-ramp would have a capacity of 1,400 vehicles per hour, but the Fourth Street on-ramp capacity would be reduced with these alternatives from the current 2,000 vehicles per hour to approximately 1,500 vehicles per hour, for a net gain in the westbound direction of about 900 vehicles per hour.) While it is true that the I-80 freeway is at capacity in the westbound direction during the PM Peak Hour, and that additional on-ramp capacity would not help to alleviate that situation, it is also true that increasing the points of access to the freeway would facilitate travel during off-peak periods (when the mainline freeway is not at capacity), and would somewhat reduce the vehicle miles traveled on local streets such as Harrison Street.

An additional and more direct route to the proposed Second Street on-ramp from some areas of the Financial District under the Second Street Option of Alternatives Three and Five would be to use First Street. Because of the proposed restriping of First Street from the existing four lanes to five, the two right-hand side lanes on First Street from Howard Street to Harrison Street would be used to access the proposed new on-ramp. Those two lanes would be exclusive right turn lanes at the First Street/Harrison Street intersection providing almost direct access to the on-ramp.

The major function provided by either the new on- or off- ramp at Second Street, or by the widening of the Fourth Street off-ramp proposed in the Fourth Street Option of Alternatives Three and Five and the Preferred Alternative, is to provide additional accessibility and capacity between the regional freeway system and downtown San Francisco. This function can be enhanced by means of better signing and by improvements in signal timing along corridors leading to or from freeway ramps. However, these measures, which are implemented by the City's Department of Parking and Traffic on an as needed basis, cannot wholly substitute for additional ramp capacity.

C. There is no Need for the Second Street Off-Ramp (Clocktower, Design, Bird, Paglietti, Baldwin, Lowe, Chappell, SOME Rose, Pell, Kaliski, Koga, Matsoukis)

As shown in Table 4.5-6 (page 297 of the EIS/EIR) removal of the Embarcadero Freeway and the TSS, resulted in a loss of I-80 off-ramp capacity of about 3,800 vehicles per hour. Adding back some of that capacity in the eastbound direction could be accomplished by one of two ways: by widening the mainline deck leading to the Fourth Street off-ramp, as proposed in the Fourth Street Option of Alternatives Three and Five and the Preferred Alternative, or by building a new off-ramp to Second

Street, as proposed in the Second Street Option of Alternatives Three and Five. It is true that exiting the freeway at Fourth Street provides easy access to areas north of Market Street, since drivers can use Third Street to connect to Kearny and Geary Streets. Under the Second Street Option, this possibility would remain, since the Fourth Street off-ramp would be retained with the same configuration that it has today. Additionally, under the Second Street Option, drivers would have the option of continuing on the freeway for approximately 550 meters (1,800 feet), if their destination is closer to the waterfront. From the Second Street touch-down, possible routes to north of Market Street destinations include Second-Folsom-Fremont, Second-Folsom-Main, and Second-Folsom-The Embarcadero. The Second Street off-ramp would also have advantages (over the Fourth Street off-ramp) for drivers heading to the Second Street and South Park area, or to the southern waterfront.

As stated above regarding the Second Street on-ramp, the major function provided by either the new on- or off- ramp at Second Street, or by the widening of the Fourth Street off-ramp proposed in the Fourth Street Option of Alternatives Three and Five and the Preferred Alternative, is to provide additional accessibility between the regional freeway system and downtown San Francisco. This function can be enhanced by means of better signing and by improvements in signal timing along corridors leading to or from freeway ramps. However, these measures, which are implemented by the City's Department of Parking and Traffic on an as needed basis, cannot wholly substitute for additional ramp capacity.

D. Include the DPT Variant at an Equal Level of Detail (Goodenough)

As first described on page 5-6 of the EIS/EIR, the DPT Variant (now the Preferred Alternative) is essentially a modified version of the Fourth Street Option of Alternative Five. The DPT Variant (the Preferred Alternative) emerged as a possible Alternative immediately prior to publication of the Draft EIS/EIR, and was described in the Draft EIS/EIR at pages 87-89. Traffic impacts of this Alternative were described at pages 293-294 of the Draft EIS/EIR. Regarding the non-traffic impacts, the Draft EIS/EIR indicated which of the other specific Alternatives would have impacts comparable to the DPT Variant. Hence, although it was intended for the DPT Variant to be brought up to a comparable level of analysis with the other Alternatives in the Final EIS/EIR, adequate information was presented about this Alternative in the Draft EIS/EIR to provide the public with a meaningful opportunity to understand and comment upon its potential environmental impacts during the public comment period. In terms of traffic congestion, freeway operations, and all other environmental issues, effects of the DPT Variant would be "bracketed" by effects of Alternative Four and the Fourth Street Option of Alternative Five, and thus are thoroughly analyzed in the Draft EIS/EIR, even if the Draft did not devote the same number of pages to the DPT Variant as to other alternatives. To confirm and clarify the way in which potential effects of the

DPT Variant are "bracketed" by effects of other alternatives, an expanded traffic analysis of the DPT Variant has been conducted, and the results are presented in the EIS/EIR under the name "Preferred Alternative".[8]

Alternatives withdrawn from consideration are described on pages 120-131 of the EIS/EIR. As noted by the commenter, "screening criteria" or reasons for rejecting alternatives are qualitative, and are appropriately derived from the stated purpose and need for the project contained in Section One (pages 31-47 of the EIS/EIR). The DPT Variant has not been rejected, and is clearly recognized in the EIS/EIR as the Preferred Alternative.

A new section of text, beginning on page 56 of the EIS/EIR, describes the process by which a locally preferred project alternative was selected (Section 2.1.4, Selection of the Locally Preferred Alternative). As explained in this section, the DPT variant was selected by the Board of Supervisors as the preferred alternative. An expanded description and illustration of the Preferred Alternative has been added (Section 2.2.6. The Preferred Alternative) beginning on page 96.

E. None of the Alternatives Provide Comparable Capacity (Johnson, Queen)

(Johnson) Views of San Francisco residents are clearly relevant to selection and adoption of Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure. At the same time, views of non-residents are also relevant, and one purpose of the project is "to restore local and regional transportation connectivity . . ." (EIS/EIR page 37).

As stated on page 15 of the EIS/EIR, the maximum volume of regional traffic which can enter and exit downtown San Francisco using the I-80 freeway during peak hours is determined by the maximum capacity at constraint points on either side of downtown: the Bay Bridge to the east, and the Hospital Curve or the I-80/US 101 junction to the west. Thus, in one sense, construction of project alternatives could have little affect on overall regional connectivity. Construction of project alternatives could affect freeway volumes in off-peak periods however, and could marginally affect freeway volumes and freeway operations between the two constraints. (See Freeway Operations analysis, pages 307-317 of the

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[8] Korve Engineering, Inc. "Traffic Analysis for the DPT Variant Alternative", Final Report, January 19, 1996. A copy of this report is available for public review at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

EIS/EIR.) Project alternatives would also have different effects on surface street congestion, and on the "street network and freeway system balance" described on page 296 of the EIS/EIR.

(Queen) The stated purpose of the project is not to reduce accessibility to the northeast quadrant of the City, but to provide accessibility comparable to what existed before the earthquake. Project alternatives would not eliminate access to homes and businesses in that area. Also, the proposed project would facilitate planned transit improvements such as the MUNI F-Line, but does not assume responsibility for impacts related to those improvements, and would not in and of itself increase transit demand, affecting regional transit capacity.

Project decision makers will use the EIS/EIR in their deliberations regarding approval or disapproval of the project, and may decide based on the information provided and/or based on public comment to approve one alternative, or to disapprove all alternatives.

F. Transit First -- There is No Need to Increase Automobile Capacity (Means, Levin, Chow)

(All Commenters) As explained on pages 265-267 of the EIS/EIR, future travel projections developed by using the Metropolitan Transportation Commission's (MTC's) travel demand model anticipate that the number of daily person trips attracted to and generated from the downtown study area will increase in the future, regardless of which alternative is selected. Similarly, there are projected to be more transit trips and more vehicle trips to and from downtown in the future regardless of which alternative is selected, with a slight increase in the percentage of daily trips that are by transit. As shown in Table 4.5-1 (page 268 of the EIS/EIR), Alternatives Three and Five would stimulate about 920 more vehicle trips into or out of the study area in the AM Peak Hour than the No Build Alternative, and would stimulate about 1,530 more vehicle trips into or out of the study area in the PM Peak Hour. Because these totals reflect trips both into and out of the study area, they do not reflect the number of "new cars" entering the City, although even if they did, they would represent increases of less than 3 % over the No Build Alternative.

(Means, Levin) As explained in the response immediately above and on page 15 of the EIS/EIR, the maximum volume of regional traffic which can enter and exit downtown San Francisco using the I-80 freeway during peak hours is determined by the maximum capacity at constraint points on either side of downtown: the Bay Bridge to the east, and the Hospital Curve or the I-80/US 101 junction to the west. Thus, in one sense, the project alternatives would do little to affect the overall capacity of the regional transportation system, although some would increase the capacity of freeway on- and off-ramps and the capacity of some surface streets Decision makers will be asked to decide, based on information and analysis in the EIS/EIR, and based on public testimony and any other information in the public record, whether to approve or disapprove the project; consistent with the commenter's suggestions, the nature of their decision will essentially be whether the increase in access and connectivity under project alternatives are "worth" the attendant increases in traffic volumes, capacity, and congestion projected to occur. San Francisco's "Transit First" policy, as described in Response 11.2 H below, will influence any decision regarding the proposed project that is made at the local level.

(Chow) The purpose and need for the project is described in Section One (pages 31-47) of the EIS/EIR. Related transportation projects are described on pages 104-111, and potential transit impacts are described on pages 340-367 of the EIS/EIR.

11.2 Responses to Comments on Jurisdictional and Funding Issues

A. Coastal Zone Consistency (USEPA)

As stated on page 114 of the EIS/EIR, the Bay Conservation and Development Commission's (BCDC's) management plan for the San Francisco Bay has been certified by the Federal Department of Commerce as the Coastal Zone Management Program (CZMP) for the San Francisco Bay Segment of the California Coastal Zone Management Program pursuant to the Federal Coastal Zone Management Act. For this reason, the California Coastal Commission has no jurisdiction, and FHWA, together with the City and Caltrans, is required to consult with BCDC regarding the project and its relationship to the CZMP.

As stated on page 235 of the EIS/EIR, all build alternatives, including the Preferred Alternative, appear generally consistent with policies and objectives of regional land use plans such as the CZMP, although an official determination of consistency would be made by BCDC when considering approval of the proposed project. BCDC's approval would be required prior to the Federal Record of Decision, and their official consistency finding would be referenced in the ROD. To clarify this point, new text has been incorporated into the EIS/EIR on page 235 as follows:

"These final determinations by the San Francisco City Planning Commission and the San Francisco Bay Conservation and Development Commission would be made following certification of the Final EIS/EIR for this project. The determination of consistency with the City's Master Plan would be made by the City

Planning Commission prior to other local actions by the Recreation and Park Commission, the Port Commission, the Parking and Traffic Commission and the Board of Supervisors. The determination of consistency with the Bay Plan, the Special Area Plan and the Total Design Plan would be made by BCDC prior to the Record of Decision by the Federal Highway Administration."

B. State Lands Commission Jurisdiction (SLC)

The following paragraph has been added to the middle of page 112: "The project would involve the use of sovereign tidelands granted in trust to the City and County of San Francisco pursuant to Chapter 1333, Statutes of 1968, (the "Burton Act") held under the exclusive control and jurisdiction of the San Francisco Port Commission. Pursuant to its duties as trustee under the Burton Act, the Port Commission must insure that activities involving granted lands must be found consistent with the granting statutes and Public Trust purposes."

C. Bayside Plaza (Port)

The office plaza in front of the Bayside Plaza building at the corner of Howard Street and the Embarcadero was formerly occupied by the elevated Embarcadero Freeway and is owned by the State Department of Transportation (Caltrans), and is leased to the Port of San Francisco, which in turn leases the property to Embarcadero South Investors. The parcel is in the process of being transferred to City ownership, and would then fall under the jurisdiction of the City's Real Estate Department.

Subsequent to publication of the Draft EIS/EIR, the City's Department of Public Works refined the design proposal for the section of roadway adjacent to the Bayside Plaza office plaza. As a result, all build alternatives, including the Preferred Alternative would avoid the plaza area. Instead, the curb of the roadway at the corner of The Embarcadero and Howard Street would be approximately six feet from the plaza edge. Figure 4.1-2, on page 239 of the EIS/EIR has been revised to reflect this refinement. Nevertheless, assuming that up to 4.5 meters (15 feet) of space would actually be used by pedestrians along the roadway, up to 19 square meters (210 square feet) of the plaza would be used by all build alternatives, including The Preferred Alternative. This office plaza is identified in the Section 4(f) Evaluation as a "non-4(f) resource". The text of the EIS/EIR has been amended on pages 7-8 and page 238.

D. Port Jurisdiction (Port)

In response to this comment, the following sentence has been added to the second full paragraph on page 112 (Section 2.4 Approval Requirements and Master Plan Policies): "According to the Port, the primary function of the Embarcadero is to provide access to the waterfront, with other functions and beneficiaries being secondary." Also, the first sentence of the last paragraph on page 137 (Section 3.1.2 Affected Environment/Land Use) has been modified as follows: "The Ferry Building provides a transition between Port land uses north and south of Market Street, as well as a centerpiece and visual focal point for Market Street and The Embarcadero itself, which is under Port jurisdiction." A footnote is also added on page 137 to explain the "Port jurisdiction."

E. Capital Cost and Financial Feasibility (SFTA)

The budgets cited in the Draft EIS/EIR were in effect prior to the current Authority Strategic Plan and therefore reflect an earlier assumption about available Prop. B funding support to the project. The current budget for the Board of Supervisors' preferred alternative, the DPT Variant, only assumes a need for $1.8 million of Prop. B funding. The difference in funding will be made up through the use of Flexible Congestion Relief (FCR) which has been included by the California Transportation Commission in the STIP.

Prop. B funds will not be used as local match for development of an underground parking garage. A decision about proceeding with the garage will be made as part of the final project approval. It is currently proposed that the local match for the garage will be provided by the Port through a revenue bond.

F. Eligibility for Emergency Relief Funds (Sierra Club, SFT)

In a letter dated April 26, 1995 from Fred J. Hempel, Division Administrator of the Federal Highway Administration to James W. van Loben Sels, Director of Caltrans, the FHWA determined that Alternatives Three and Five would meet the "comparable service" definition. A copy of this letter is available for review in the project case file at the San Francisco Planning Department.

FHWA's determination was based on information and analysis submitted by the City to Caltrans, and by Caltrans to the FHWA. This information is also available in the project case file at the San Francisco Planning Department. While FHWA's letter does not explicitly state that Alternatives Two and Four would not meet the "comparable service" definition, that is the implication. Staff of the San Francisco Department of Public Works and the San Francisco Chief Administrator's Office therefore assumed that Alternatives Two and Four would not be eligible for Federal Emergency Relief funds, because they would not meet the funding criteria established by SB 181 (Kopp, 1991). As shown in Section 4.5.1 (pages 265-340) of the EIS/EIR, traffic conditions on local streets would be acceptable under Alternatives Two and Four, and in some areas would be better than under Alternatives Three and Five. However, overall accessibility under the lesser-build alternatives, as defined by the demand-to-capacity ratio at freeway on- and off-ramps (see EIS/EIR page 296), would be less.

Subsequent to publication of the Draft EIS/EIR, FHWA determined that the Preferred Alternative, described on pages 96-104 of the EIS/EIR, also meets the "comparable service" definition, and is eligible for Emergency Relief funds. Revisions to Appendix A, Funding Sources for Alternatives, have been incorporated into the EIS/EIR, and include a funding package for the Preferred Alternative.

G. "Fundability" of Project Alternatives

(Rolfe, SFT, Levin) As described in Item F, above, only the Preferred Alternative, Alternative Three, and Alternative Five have been determined to provide "comparable service" to pre-earthquake facilities. Only these alternatives would therefore be eligible for Emergency Relief funds. As reflected in Appendix A, insufficient sources of other funds have been identified to implement Alternatives Two and Four. Project decision makers could nonetheless select one of these alternatives, and seek additional funding "down the road". Potential environmental effects of the Preferred Alternative, Alternative Three, and Alternative Five, are described in Section 4, Environmental Consequences and Mitigation Measures, and in responses to related comments below.

(Chappell, Alexander) The "comparable service" requirement of SB 181 was passed as legislation at a time when all proposals for the area included reconstruction of the TSS, and the only outstanding questions were whether there would be a ramp connection from the TSS to the Embarcadero, and what configuration the Embarcadero roadway would take. At that time, a certain portion of Earthquake Relief (ER) funds were set aside for both projects, with the understanding that the two portions could not be commingled. Thus, the funding summary presented in Appendix A describes use of Federal ER funds for both portions of the project separately. Despite this separation of funds, Caltrans and FHWA have evaluated both portions of the project *when combined*, in order to determine their eligibility for Federal funds. For this reason, it appears that the commenter is correct, that ramp improvements such as those proposed in Alternatives Three and Five are a prerequisite for funding roadway improvements along the Embarcadero. It is unclear whether a meeting between the Mayor and the Secretary of Transportation or Vice President would alter this arrangement.

H. San Francisco's "Transit First" Policy (SFT, SOMA Rose)

The City's "Transit First" policy is articulated in the Transportation Element of the San Francisco Master Plan, and is actually a Master Plan "Objective" with four related Master Plan "Policies." The Objective reads "Establish public transit as the primary mode of transportation in San Francisco and as a means through which to guide future development and improve regional mobility and air quality" (Transportation Element Objective 11, page I.4.25). Policies are as follows:

- "Maintain and improve the Transit Preferential Streets program to make transit more attractive and viable as a primary means of travel.
- "Continue to favor investment in transit infrastructure and services over investment in highway development and other facilities that accommodate the automobile.
- "Encourage development that efficiently coordinates land use with transit service, requiring that developers address transit concerns as well as mitigate traffic problems.
- "Encourage the development of one or more multi-service transportation outlets at transit-accessible locations for the sale of transit fare instruments and the provision of other kinds of trip information." (Transportation Element Policies 11.1 - 11.4, page I.4.25)

Like all Master Plan objectives/policies, the Transit First Policy is intended to guide land use decisions within the City, and as stated on page 111 of the EIS/EIR, the proposed project would be reviewed by the City Planning Commission in the context of applicable objectives and policies. Also, as stated on page 111 of the EIS/EIR, the City Planning Commission must make a finding that the project is consistent with the San Francisco Master Plan before the San Francisco Board of Supervisors can consider approval of the project.

11.3 Responses to Comments on Related Projects and Possible Future Projects (SFRA, Chester)

(SFRA) As stated on page 329 of the EIS/EIR, the 2015 future context includes related transportation projects and reasonably foreseeable future development projects assumed as part of the cumulative development scenario used to estimate travel demand. Section 2.3 (pages 104-111) lists "Related Projects," which are primarily transportation projects that are expected to affect travel to/from and within downtown San Francisco. (The only related project that is not transportation-related is the Mid-Embarcadero Open Space Project, which is related to urban design improvements.) To clarify the definition of related projects, the title of Section 2.3 has been changed from "Related Projects, Reasonably Foreseeable Future Projects, and Other Possible Future Projects" to "Related Transportation and Urban Design Projects."

Reasonably foreseeable future projects which are not strictly transportation-related, such as the Ferry Building Rehabilitation Project and approved but un-built office buildings South of Market, are not considered "related," but have been included in the employment and travel assumptions for 2015. Possible future projects, which are not strictly transportation related and which were considered remote or speculative at the time the EIS/EIR was written, are described under the "Possible Future Projects" heading, beginning on page 329 of the EIS/EIR. The description of these projects are separated from the description of related projects because of their speculative nature. Also, the speculative nature of these projects means that it would be inappropriate to discuss them at great length in different sections of the EIS/EIR. For this reason, the discussion of their potential cumulative transportation consequences is limited to pages 329-340, and potential cumulative effects such as views, wind, and shadow are mentioned in passing.

(Chester) Page 104 of the EIS/EIR correctly states that impacts of these related projects are not analyzed in the document, which is intended to provide decision makers and members of the public with an analysis of impacts from the proposed Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure. Rather, these related projects are assumed to be in place (except where stated otherwise), and form the basis ("baseline" or "future context") for the impacts analysis.

11.3.1 CalTrain Extension (JPB, SFRA, SFT)

Based on current information from the CalTrain Extension project team (Working Paper on Alternatives Considered, April 1, 1996, Kaiser Engineering), the following paragraph has been added at the bottom of page 110 in the EIS/EIR, with the sub-heading "CalTrain San Francisco Downtown Extension Project."

"The Peninsula Corridor Joint Powers Board plans to extend CalTrain from its current San Francisco terminal at Fourth and Townsend Streets. The proposal currently being analyzed would construct a new terminal underground at the existing Transbay Terminal site (Mission Street between First and Fremont Streets). A Draft EIS/EIR analyzing this extension project is expected to be available for public comment in the fall of 1996."

Also, the text in the second sentence of the fourth paragraph on page 343 has been modified and a new sentence has been added as follows: "The current proposal would build a underground station at the Transbay Terminal site at Mission, First, and Fremont Streets."

11.3.2 Construction on Assessor's Blocks 202 and 203 (GGC, Walters, Aarons)

None of the project alternatives propose construction of roads or buildings on Assessor's Blocks 202 and 203, and no physical or jurisdictional change to these blocks or to Justin Herman Plaza would occur under any of the alternatives, except for the potential construction of an underground parking facility on Block 202 as a functional replacement for Port parking displaced by the project, and approximately 5.5 meters (18 feet) on the north and south side of Block 203 will be used for right-of-way to reestablish the pre-freeway street width. Nonetheless, the EIS/EIR analysis assumes that some development would occur on Block 203 and half of Block 202 because SB 181 (Kopp, 1991) allows for the sale of former Embarcadero Freeway parcels that are not required for roadway improvements. This assumption of future development was necessary in order to present a reasonable analysis of potential future traffic conditions. Any sale and development of Blocks 202 and 203 would be subject to separate environmental analysis and an approval process, during which there would be ample opportunity for public comment.

The San Francisco Planning Department has received an application for Environmental Evaluation of the potential development on Assessor's Blocks 202/203, and an Initial Study is presently being prepared. It is anticipated that the Initial Study will lead to a requirement that an Environmental Impact Report be prepared to analyze the potential effects of that project. Such an EIR would need to address the potential impacts from alternative development (and possibly rezoning) scenarios for those parcels. At present there are several alternative development scenarios for these blocks which are under consideration. Alternative scenarios include different combinations of hotel, retail, theater, office, residential, parking and open space uses. That EIR, if required, is not expected to be completed until some time in 1997.

11.3.3 Rincon Hill Arena and Mission Bay Entertainment Complex (Schmaltz, Bird, Hestor)

(Schmaltz) As explained in the "Possible Future Projects" section of the EIS/EIR (pages 329-340), there are a number of potential future projects that may affect future land use and transportation issues in the vicinity of the project. Some of these potential future projects, such as a sports and entertainment complex in Mission Bay, are entirely speculative in nature, and no environmental analysis has been initiated. Other potential future projects, such as the Rincon Hill Arena, are more "real" in the sense that formal proposals have been advanced, and they are the subject of ongoing environmental analysis.

Analyses of the arena proposal will consider the potential for a "land use conflict," and "negative impacts on district traffic and urban design".

(Bird) All of the possible future projects, regardless of their status, would require approval actions by City decision makers prior to implementation, and opportunities for public input would be provided, where individual opinions regarding "inappropriate land uses" could be expressed. None of these potential future project would be precluded or prejudiced by the Alternatives to the Embarcadero Freeway and the Terminal Separator Structure analyzed in this EIS/EIR, and none would preclude adoption and construction of any of the project alternatives. Potential future cumulative effects of the project alternatives when combined with possible future projects have been considered to the extent feasible, and with as much specificity as is possible, given the amount of information known about these projects at this time. The information regarding these future projects has been updated as of the date of publication of this Volume II: Summary of Comments and Responses (see staff initiated text changes on pages 329- 340 of the EIS/EIR.)

As noted by the commenter, additional ramps between I-280 and King Street have been planned for some time, and are expected to be completed by June of 1997. When complete, these ramps would likely provide additional access between the Peninsula and the southern waterfront. Patrons of any future sports and entertainment facilities in the vicinity of the southern waterfront would clearly make use of these King Street I-280 ramps.

(Hestor) Determining the scope of an EIS/EIR involves consultation with lead and responsible agencies, and with the public. Also, EIS/EIRs typically take some time to prepare, and changing environmental circumstances must constantly be taken into account, and factored-in to the extent feasible.

Early on, during preparation of the current EIS/EIR, a decision was made to assume that the Transbay Terminal and associated ramps would remain where they currently are. The City was aware that a study of the Transbay Terminal was under way. However, since the future location of the Terminal was then, quite uncertain, and since work on the CalTrain Extension EIR, which will look at alternative locations for the Transbay Terminal, has just recentyly begun, the assumption that the Terminal would remain in its current location was necessary in order to proceed. More current information on this project has been added to the EIS/EIR on page 330. When a final decision is made regarding this project, the CalTrain Extension EIR will have the benefit of being sure where ramps will be built, where land is available for alternative sites, and what the projected traffic volumes will be. Similarly, the Arena project, now referred to as the "Rincon Sports and Entertainment Center," will have the benefit of the same information. Pages 308-310 of the Draft EIS/EIR contained available information about the arena proposal at the time of publication.

This information has been updated in the Final EIS/EIR, although impacts of the Arena project are discussed only insofar as they may cause cumulative impacts when combined with effects of Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure. Updated information on the China Basin ballpark proposal has also been incorporated. (See page 335 of the EIS/EIR.)

Regardless of the status of these other possible future projects, the analysis in this EIS/EIR allows decision makers on this project to make a reasoned comparison between the alternatives discussed in terms of how they distribute traffic between the City streets and the freeway.

11.3.4 MUNI Ferry Bus Terminal (Port, MUNI, SFT)

The first paragraph under the MUNI Ferry Bus Terminal subheading (page 108 of the EIS/EIR) has been modified and expanded to read as follows:

"MUNI's paved bus lot, located between Mission Street, Justin Herman Plaza, Steuart Street, and The Embarcadero, serves as the terminus for 11 bus lines which use electrical and diesel powered coaches. MUNI has plans to improve the configuration of this lot, which is called the Ferry Bus Terminal, and expand it towards the Bay. According to MUNI staff, the expansion is needed to accommodate MUNI's increasing use of 60-foot long articulated buses, and to accommodate the long term expansion of bus transit service to the area, while accommodating the F-Line tracks and an emergency ventilation structure associated with the MUNI Metro Turnaround project. The current size of the Ferry Bus Terminal is approximately 3250 square meters (35,000 sq. ft.) and the planned bayward expansion would add approximately 930 square meters (10,000 sq. ft.) to its current size. Although funded and planned for some time, the expansion of the Ferry Bus Terminal has not been approved by the San Francisco Port Commission, which has jurisdiction over the land required for the expansion. According to Port staff, the Port may use the planned expansion area for layover facilities associated with the Ferry Terminal Expansion if terms of agreement are not reached between MUNI and the Port regarding expansion of the bus facility."

The title of this subsection has been changed from "Muni Bus Layover Lot" to "MUNI Ferry Bus Terminal." Likewise, references to this facility have been changed throughout the text.

11.3.5 MUNI F-Line (MUNI)

Per MUNI's request, the planned F-Line loop-track at the Ferry Bus Terminal has been added to the description of the F-Line. Specifically, the following statement has been added after the first sentence in the F-Line section on page 107: "A loop track through and partially around the MUNI Ferry Bus Terminal is planned to serve as a terminal for F-Line service in case of emergencies or street closures."

11.3.6 Transbay Terminal (Schmaltz)

As stated on page 330 of the EIS/EIR, relocation of the Transbay Terminal is currently the focus of a study, which is analyzing potential relocation of the Terminal to the block bounded by Main, Beale, Folsom, and Howard Streets, on a parcel that was opened-up by removal of the Terminal Separator Structure. The San Francisco Board of Supervisors has recently expressed its preference for the relocation to that site. Alternatives for constructing a new bus terminal and associated bus ramps on the existing site, or a new terminal at the Main/Beale site are expected to be analyzed in the CalTrain Environmental Impact Report. A draft of that report is expected to be available later this year. It would be premature to anticipate the results of this environmental analysis or the decision-making process that would follow, and it would be infeasible to incorporate that multi-faceted analysis into the current EIS/EIR, given the status of both proposals and the objectives of each.

The proposed improvements on First and Fremont Streets assume continued operation of the Transbay Terminal at its present site. Should an alternative site be chosen, the role of these streets in serving transit access and circulation needs to be reevaluated. The curb-to-curb width of First and Fremont Streets somewhat limits the possible increases in capacity along those roadways. The proposed extension of the left-side transit lane along First Street, south of Howard Street, is expected to alleviate some of the potential transit /automobile conflicts. The elimination of buses or street cars from those streets or limiting their access to the Transbay Terminal would most likely result in an increase in automobile usage and an increase in traffic congestion.

The current analysis also cannot assume relocation of the terminal or the MUNI bus lines which serve it, although the October 23 comment letter from Peter Straus, MUNI Director of Service Planning, indicates that MUNI staff and decision-makers are proposing relocation of the 15-Third bus route, and considering similar changes to the route of the 12-line and the 42-line. While these relocations would not necessarily result in substantial reductions of projected future traffic congestion on the First Street corridor, they would reduce potential future transit delay, and eliminate some of the transit movements which contribute to overall congestion levels. Also see Response 11.4.10 C, Changes to Transit Routes and Transit Stops, below.

11.4 Responses to Comments on Transportation Effects and the Transportation Analysis

11.4.1 Chinatown Traffic (CRC, Hestor, Chinatown TRIP, Mah, Chung, Lim)

In response to comments received from the Chinatown community on the Draft EIS/EIR, the City conducted a supplemental study between October 1995 and March 1996, to address these comments and concerns. The supplemental analysis was conducted with substantial input from the Chinatown and North Beach communities, and included approximately ten working sessions and three publicly noticed meetings.

While the Chinatown Area Transportation Study was being conducted, several meetings were held between City staff and Chinatown neighborhood organizations and concerned citizens to discuss the study, and the issue of transportation problems in the Chinatown area. On March 5, 1996, a letter was sent to Rebecca Kohlstrand of the Chief Administrative Officer's office, signed by representatives of Chinatown TRIP, the Chinese Chamber and the Chinatown Resource Center. That letter summarized the concerns that had been expressed by the Chinatown community throughout the process, and requested that their concerns be incorporated into the Final EIS/EIR for this project. A copy of that letter is incorporated into the Comment and Coordination section of the EIS/EIR (pp 531-534). The additional analysis included evaluation of pre-earthquake and existing traffic and transit conditions, the evaluation of traffic, transit, parking and pedestrian conditions and identification of improvements. The study results and recommendations are documented in the Final Report, Chinatown Area Transportation Study, July 1, 1996. A copy of this report is available for review at San Francisco Planning Department, 1660 Mission Street. The study results and recommendations are also summarized below, and in a new section of the EIS/EIR (Section 4.5.6: Chinatown Area Analysis, pp 386-396).

Accessibility

In the vicinity of Chinatown, the Broadway ramps at Sansome and Battery and the ramps to Washington and from Clay provided access to I-80 via the Embarcadero Freeway and the Terminal Separator Structure for travel to the East Bay and to the San Francisco Peninsula. Chinatown, North Beach, Fisherman's Wharf, and other areas north of the downtown core primarily relied on those ramps for access to the freeway system. The Embarcadero Freeway, while not depositing vehicles within the heart of Chinatown, did facilitate access to Chinatown by eliminating the need to traverse local streets.

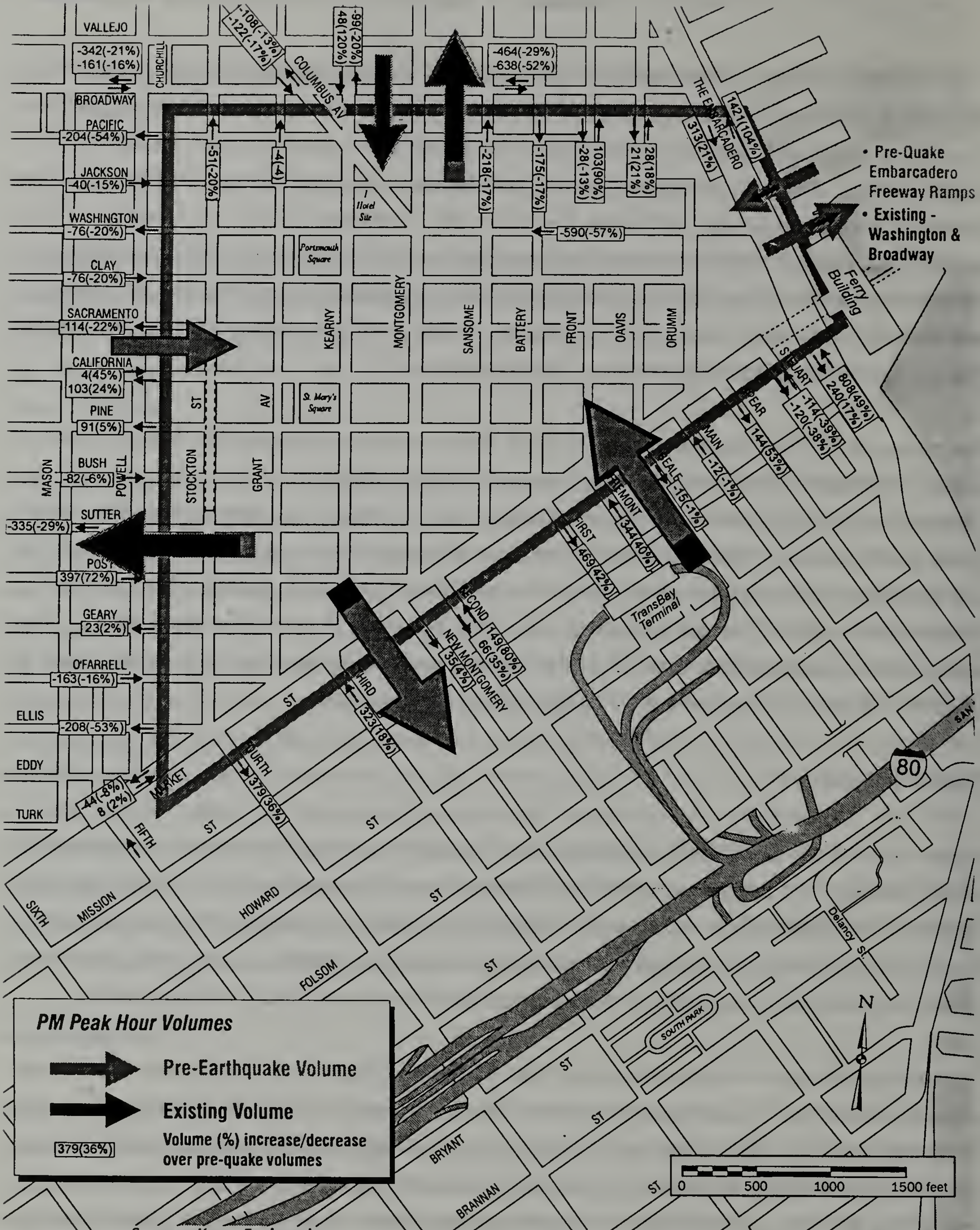
These freeway ramps provided well-defined paths on arterial streets (Broadway, Columbus, Washington, Clay, etc.) to go to and from the freeway system using different approach routes, with little overlapping use of each ramp and minimal dispersion of traffic onto alternate routes through adjacent neighborhoods. However, during peak traffic periods, which in many instances existed for large portions of both weekdays and weekends, the ramps also represented a focus for congestion in the vicinity of the points of contact between the freeway ramps and the local street network, because of differences between the capacities of the local streets and the capacity of the mainline I-80 freeway to absorb traffic. As a result, traffic unable to merge into the I-80 mainline freeway regularly queued on the Embarcadero Freeway that functioned as an elevated parking lot.

The closure of the Embarcadero Freeway because of the earthquake eliminated the Broadway ramps and the Washington/Clay ramps, reducing congestion at those locations but affecting local traffic by dispersing regional traffic onto local streets. The absence of freeway ramps close to Chinatown, North Beach and Fisherman's Wharf intensified the use of the remaining freeway ramps south of Market Street and those street corridors leading to and from them: Battery St./ First St., Bush St., Montgomery St., Stockton St./Fourth St., Fremont St./Sansome St., Third St./Kearny St., and The Embarcadero. The absence of well-defined routes to and from the freeways has created some confusion about access to Chinatown, North Beach and Fisherman's Wharf, especially among visitors.

Traffic Volumes

Figure 4.5-16 (from the EIS/EIR) provides a more detailed comparison of the pre-earthquake and existing volume at a screenline surrounding Chinatown and downtown north of Market Street. A screenline is a hypothetical line that would be crossed by vehicles, and is generally used to describe the magnitude of travel and changes between various conditions/scenarios. Due to limited information for the AM peak hour at the screenline locations, only the PM peak hour conditions are presented.

The volumes indicated reflect the increase in traffic accessing Chinatown via local streets (the volumes crossing Market Street have increased considerably). Correspondingly, the number of vehicles accessing North of Market from the waterfront via Washington and Broadway has decreased substantially due to the removal of the Washington and Broadway ramps. This has resulted in a reduction in the number of vehicles on the streets accessing ramps, namely Broadway, Washington and Clay. It should be noted that west of Chinatown, eastbound traffic on Broadway during the AM peak hour has increased due to additional motorists using Broadway to commute into downtown, while westbound traffic has decreased by approximately the same amount. In addition, traffic from east/west



Source: *Korve Engineering*

92.202E & 94.060E
Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Pre-Earthquake vs. Existing Traffic Volumes at Downtown/Chinatown Area Screenlines

Figure 4.5-16

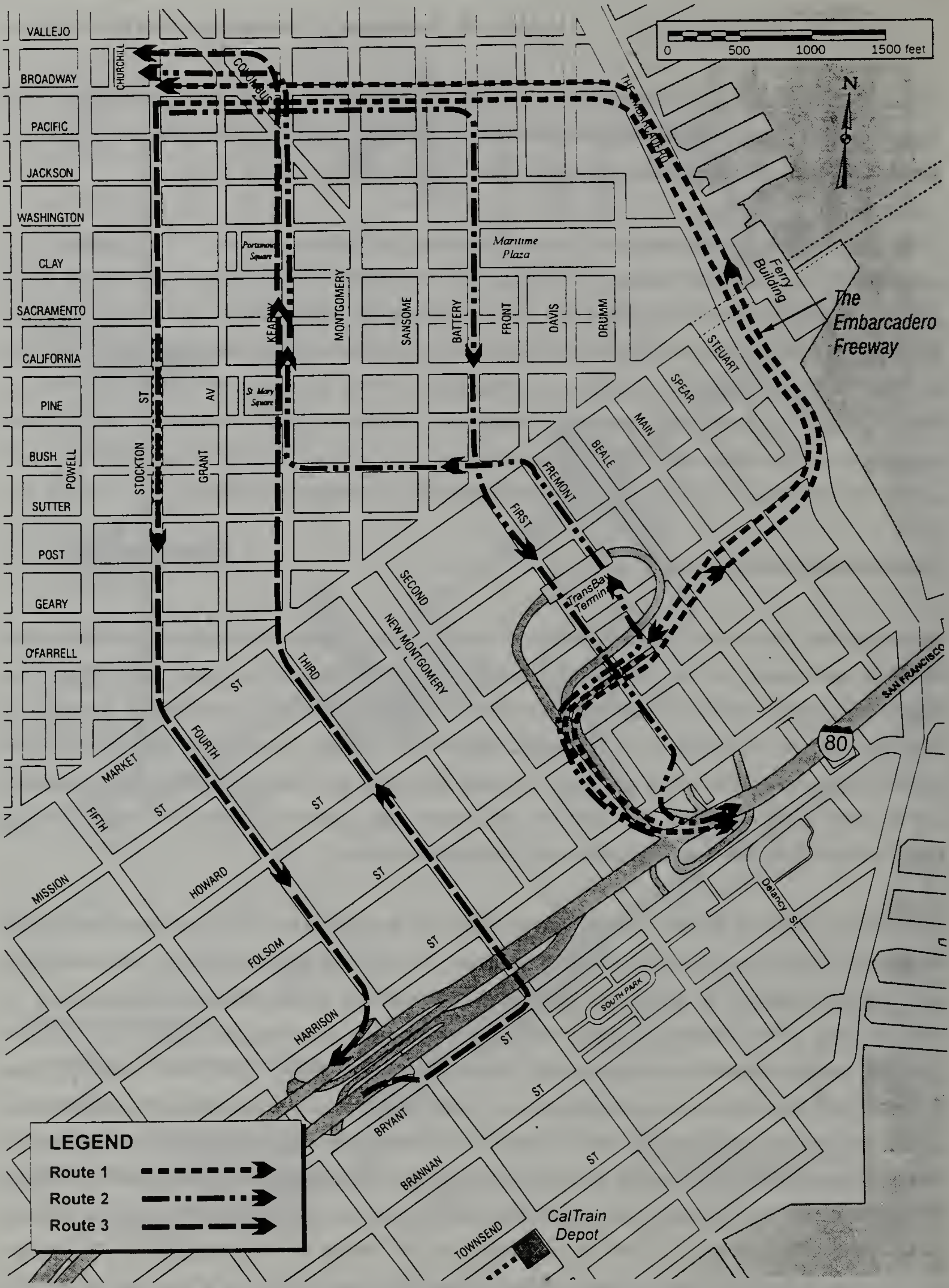
streets east of Powell and north/south streets north of Pacific Avenue has decreased slightly, due partially to the removal of the freeway ramps. Traffic volumes on Hyde Street south of Turk Street (not included in Figure 4.5-16) increased by approximately 200 to 400 vehicles per hour.

Traffic volume comparisons conducted by the Department of Parking and Traffic were reviewed and supplemented by additional volume comparisons at intersections within Chinatown. Overall, traffic volumes at intersections within Chinatown have not changed substantially. The most substantial increase has been on Stockton Street southbound, with increases of approximately 50 to 100 vehicles per hour at Pacific Avenue, 200 vehicles at Sacramento Street and approximately 250 vehicles at Market Street. However, traffic operating conditions in Chinatown have been affected by localized congestion (due to a large extent to double parking) and congestion at Union Square and the downtown core which spills back into Chinatown on Stockton, Kearny and Montgomery Streets.

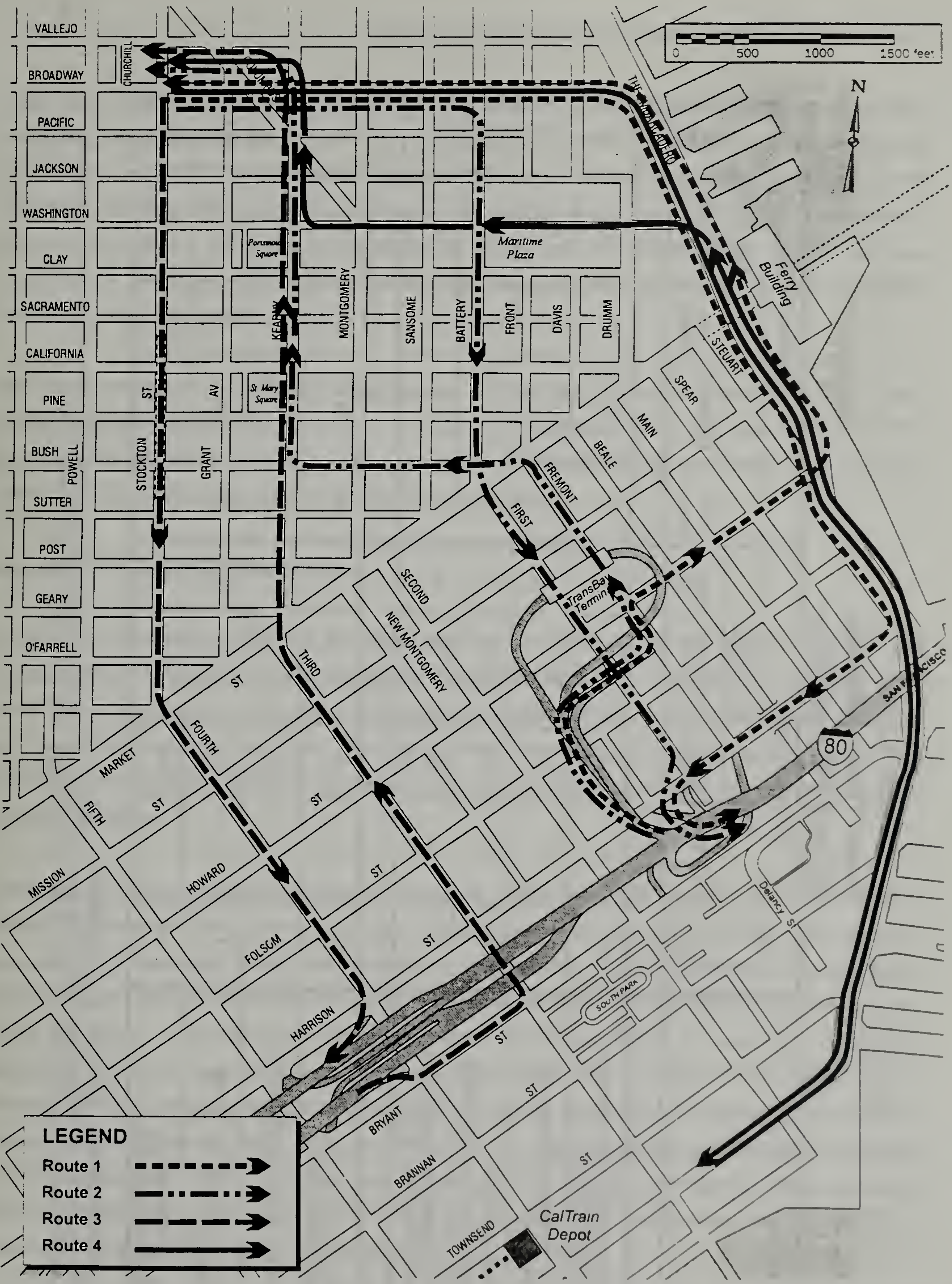
Travel Paths/Travel Times

To evaluate the relative difference in travel times between pre-earthquake, existing and future year 2015 No Build and two of the four TSS/Mid-Embarcadero Build alternatives, average travel times were estimated for travel paths to Chinatown. Four travel routes were selected for purposes of comparison. These routes are presented on the attached Figures 4.5-17 and 4.5-18 (from the EIS/EIR), and represent common/typical paths that would be used to access the common intersection of Broadway and Stockton from the I-80/U.S. 101 and I-280. The travel times include the portion of the trip that would occur on the freeway, on the ramp system and on the local streets.

The attached Table 4.5-20 (from the EIS/EIR) presents the average AM and PM peak hour travel times for the four routes through downtown and Chinatown. Travel times are presented for pre-earthquake and existing conditions, for future year 2015 No Build conditions, for the Preferred Alternative and for Alternative 3B. Under existing conditions, comparison of the two routes (Routes 1 and 2) to Chinatown from I-80 westbound/the Bay Bridge indicate similar travel times during both the AM and PM peak hours, for both inbound and outbound directions. Travel times to the Peninsula (Route 3) are somewhat longer, and are longest during the PM peak hour. Pre-earthquake travel times were generally slightly shorter, by approximately 2 minutes, during both the AM and PM peak hours. The exception is Route 2 conditions during the PM peak hour, where travel times were one minute longer than under existing conditions. This difference is due to congestion at the merge to I-80 eastbound. The merge configuration of the First Street on-ramp under pre-earthquake conditions was a lane merge with I-80 eastbound traffic, while this merge is currently a lane-add.



92.202E & 94.060E Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure	Travel Paths Pre-Earthquake Conditions	Figure 4.5-17



92.202E & 94.060E
Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure

Travel Paths
Existing/No-Build Conditions

Figure 4.5-18

Table 4.5.20
Travel Times (Minutes)
AM and PM Peak Hour

Route	AM PEAK HOUR					PM PEAK HOUR				
			Year 2015					Year 2015		
	Pre-Quake	Existing	No Build	Preferred Alt.	Alt. 3B	Pre-Quake	Existing	No Build	Preferred Alt.	Alt. 3B
Inbound										
1 I-80 WB to Broadway/ Stockton via Embarcadero/Broadway	10	12	13	13	12	13	15	17	16	18
2 I-80 WB to Broadway/Stockton via Fremont/Kearny	12	12	12	11	11	14	15	15	14	15
3 I-80 EB/U.S.101 NB to Broadway/Stockton via 3rd/Kearny	16	12	15	12	18	25	27	27	26	26
4 I-280 NB to Broadway/Stockton via Embarcadero/Washington (1)	--	--	15	15	15	--	27	15	15	15
Outbound										
1 Broadway to I-80 EB via Broadway/Embarcadero	5	7	8	8	8	6	8	9	9	9
2 Broadway to I-80 EB via Battery/First Street	7	7	9	7	8	10	9	9	9	9
3 Broadway to I-80/U.S 101 SB via Stockton/4th (2)	11	12	12	12	16(12)	17	18	22	22	23(15)
4 Broadway to I-280 SB via Broadway/Embarcadero (1)	--	--	13	13	13	--	--	15	15	15

Notes:
(1) Route 4 evaluated only for future year 2015 conditions
(2) Under Alternative 3B, a 2nd Street on-ramp connection to I-80/U.S. 101 southbound is proposed. Travel times in parentheses represent an alternative route from Chinatown to the South Bay via Broadway, Battery, First, Harrison to the 2nd Street on-ramp.

Under future year 2015 No Build conditions, travel times on the routes are anticipated to increase marginally over existing conditions. For both the Preferred Alternative and Alternative 3B, travel times for all routes would either be the same or marginally shorter than under the No Build conditions. Under Alternative 3B, which includes the construction of the Second Street on-ramp to U.S.101 southbound, the travel route (Route 3) to this ramp would include Battery and First Streets, rather than Stockton and Fourth Streets, and during the PM peak hour the travel times from the Chinatown area would be shorter than via Stockton and Fourth Streets.

With the completion of the I-280 King Street ramps, I-280 would become an attractive route to access the Peninsula and southern San Francisco. It would provide an alternative to the use of the U.S. 101/I-80, the Fourth Street ramps and Stockton and Kearny Streets (Route 3), and travel times would be shorter than Route 3 during both the AM and PM peak hours.

Intersection Operating Conditions

A number of intersections within the Chinatown area were analyzed for the weekday AM and PM peak hours conditions for pre-earthquake, existing and future 2015 scenarios. The results indicate that future traffic congestion would generally occur at the same locations as it occurs today, but with longer delays and sometimes higher (worse) LOS. Most of the intersections would not change LOS substantially between pre-earthquake, baseline and any of the three future alternatives, with some exceptions commented below.

Under pre-earthquake conditions, localized congestion higher than under baseline or future conditions occurred at those locations providing access to and from the Embarcadero Freeway, such as along Broadway and Washington Street. Generally, traffic congestion at most of the intersections analyzed in this study would operate at acceptable levels of service (level of service D or better) under existing and future conditions. Intersections operating at or close to unacceptable LOS would be Third/Market Streets during the AM peak hour under Alternative 1 (No Build), and the intersections of Stockton/Clay Streets and The Embarcadero/Broadway during the PM peak hour under the Fourth Street Option of Alternative Three (Alternative 3B). During the PM peak hour, the intersection of Powell Street/Broadway currently operates at LOS C, and would operate at LOS D under future conditions. Before the Loma Prieta earthquake the intersections of Stockton St./Broadway and Kearny St./Broadway operated at or close to unacceptable LOS during the PM peak hour.

Issues Identified and Evaluated

During the evaluation of pre-earthquake and existing conditions and public participation process, the following transportation issues were identified. Following the evaluation of these issues, an improvement program was developed.

Traffic

Since the Embarcadero Freeway was removed the direct identifiable routes to Chinatown have also been removed and routing to Chinatown is not clear. The interim traffic improvements implemented in 1990 included improved destination guide signs, but should be reassessed and expanded to assist motorists to the most direct and quickest routes to take to access and leave Chinatown.

In addition, with removal of the Embarcadero Freeway on-ramps at Clay and Broadway, drivers, particularly those destined to Peninsula and south San Francisco, have rerouted to alternate north/south paths within Chinatown. This resulted in increased traffic congestion and delay for local Chinatown traffic.

Within Chinatown there is localized congestion which delays auto and transit vehicles. This congestion existed before the earthquake, but with the dispersion of traffic following the removal of the Embarcadero Freeway, this congestion has been exacerbated. It is due in part to additional vehicles and to double parking of autos and trucks, buses blocking moving traffic when they are not able to use bus stops within Chinatown, and congestion "adjacent" to Chinatown such as near Union Square. In addition, vehicles looking for on-street and off-street parking add to the congestion, and pedestrian traffic crossing the streets also impedes the ability of vehicles to complete turns.

Transit

Some problems have been identified. Traffic conditions in and around the Chinatown area are frequently congested. Buses moving through the area are often delayed because of commute traffic congestion. Pedestrian activity also plays a role in delaying buses, particularly at locations where buses making a left or right turn must wait for pedestrians to clear the crosswalk before clearing the intersection. It has been reported in public meetings that pedestrian crossings sometimes allow only one or two vehicles to make a turn during each traffic signal cycle. Some buses (such as Route 15) are known to be consistently overcrowded in some segments of the route. This effect is partially the result of traffic delays. When a bus is delayed, riders waiting at bus stops accumulate until a bus finally arrives, and then board the bus. The effect for some riders is that a bus doesn't arrive until after its scheduled time, and then when it does arrive, it is often overcrowded because of the accumulation of riders who had been waiting further up the line.

While existing bus service serving Chinatown provides good service coverage, overcrowding and congestion reduce the effectiveness of this service. Improvements to facilitate the movement of buses through Chinatown and additional transit service into and through Chinatown should be implemented.

There has been a strong desire to have additional rail service into Chinatown. Extension of rail service either through proposed Third Street/Bayshore Corridor or the F-Market line to serve Chinatown is desired.

Parking

The parking supply in Chinatown is inadequate to serve the needs of Chinatown. Of primary concern is the need for off-street facilities within Chinatown or adjacent to Chinatown but easily accessible, to support the Chinatown visitor shopping patterns. In addition, many visitors drive directly to the Portsmouth Square garage, causing queues and congestion on the streets adjacent to the garage, while other garages are underutilized.

Truck loading/unloading within Chinatown is generally within on-street metered spaces and restricted to 30 or 60 minutes. These regulations are often disregarded by trucks which park in front of the businesses all day, thereby forcing other trucks to double park while loading/unloading. This substantially limits the availability of loading/unloading facilities for trucks, blocks transit and auto traffic and results in congestion on the street.

Pedestrians

High levels of pedestrian activity are one of the most characteristic features of Chinatown. While the high levels often result in slow pedestrian speeds and impede pedestrian movement on sidewalks, these conditions have been accepted as an integral character of Chinatown.

Pedestrian issues raised by the community generally focused on methods to discourage visitors from driving to Chinatown and further congesting the streets, and walking instead. At community meetings, the fact that visitors are often not aware that Chinatown is within walking distance from Union Square was often repeated. Improvements to educate visitors on proximity of Chinatown to downtown and North Beach and providing destination guide signs were recommended.

Improvement Program

Based on the evaluation of issues and concerns in the Chinatown area, a number of traffic, transit, parking and pedestrian improvements were identified and evaluated. A substantial component of the evaluation included evaluating alternative rail alignments into the Chinatown Area and developing a parking plan for Chinatown. The study recommendations were incorporated into an Improvement Program, presented as three distinct programs, as follows.

Mid-Embarcadero/TSS Improvement Program

The following measures have been incorporated into the Preferred Alternative of the Mid-Embarcadero project and would be implemented as part of the Mid-Embarcadero/TSS Project which is scheduled for completion in 1999.

1. Destination Guide Signs
2. Signalization of the Broadway/Front and Broadway/Davis Intersections
3. Variable Message Signs for Parking Access Routes
4. Extend MUNI Route #83 to The Embarcadero
5. Reconfigure the Intersection of The Embarcadero/Washington Street
6. Reserve Adequate Right-of-Way for Future Rail Service on Washington Street
7. Exclusive Transit Lane for MUNI Route #15

Interim Improvement Program

The following measures are implementable in the short range (1996) by staff or within already identified funding sources.

1. Extend Hours of Peak Period Tow-Away Zones
2. Destination Guide Signs
3. Signing to Parking Facilities
4. Increased Parking Enforcement
5. Signal Timing and Interconnections
6. Signal Timing Revision on Montgomery Street between California and Sutter
7. Promote Use of the Golden Gateway Garage Shuttle Service
8. Enhance Use of Sutter/Stockton Garage for Chinatown Visitors

9. Informational Brochures and Promotional Measures
10. Enforcement of Merchant Sidewalk Encroachment Violations
11. Better Coordination of Transit Runs and Schedules

The following measures are implementable on a slightly longer time frame - 1997 and 1998.

1. Destination Guide Signs
2. Northeast Quadrant Transportation Study
3. Bus Islands and Bulbs
4. Articulated Buses on MUNI Route #30
5. SamTrans Weekend Service
6. Seismic Upgrade Project for the St. Mary's Garage
7. New Vallejo Street Garage
8. Fifth and Mission Garage Signing
9. Short-term Improvements on the #38 Geary and #9X San Bruno

Long Range Improvement Program

1. Bayshore Corridor Rail
2. F-Market Line to Chinatown
3. Cable Car Service Expansion
4. Interim Parking Facility

In summary, the concerns raised by the Chinatown community are broken into three categories of improvement programs: an interim program, a Mid-Embarcadero/Terminal Separator Structure program, and a long range transit program.

The Interim Improvement Program measures are those which the City can implement independent of, and prior to construction of the Mid-Embarcadero/Terminal Separator Structure project. These involve transportation problems in the Chinatown area which generally are not considered by the City to be directly related to, or primary impacts of the demolition of the Embarcadero Freeway, or construction of the mid-Embarcadero/Terminal Separator Structure project. They also generally involve improvement measures which can be implemented without major capital expenditure.

The Mid-Embarcadero/Terminal Separator Structure program generally involved measures which are more directly related to the proposed project and its potential effects on the project area, including access to/from the Chinatown area from The Embarcadero. These improvement measure would be implemented as part of the proposed Mid-Embarcadero/Terminal Separator Structure project.

The Long Range Transit Improvement program involves measures to improve transit access to the Chinatown area from other parts of the City. These measures are considered by the City to be outside the scope or purpose of the Mid-Embarcadero/Terminal Separator Structure project. These measures would also require major capital expenditure.

11.4.2 Traffic Near Second Street and the Clocktower

A. Second Street Off-Ramp would Terminate at the Clocktower's Driveway (Clocktower, SOMA Rose, Baldwin, Gott, Meader, Pell, Chow, Kaliski, Koga, Berge, Matsoukis)

The off-ramp proposed in the Second Street Option of Alternatives Three and Five would touch down across Second Street from the Clocktower, an architecturally significant building. The garage on Second Street was accounted for in the traffic simulation model of future traffic conditions as a "sink" (a destination for vehicles entering the garage), and a "source" (an origin for vehicles leaving the garage) in the local street network. Off-ramp volumes associated with the new ramp would reach about 900 vehicles per hour in the PM Peak by 2015, but would not cause the level of service at nearby intersections to deteriorate. (See Table 4.5-2, page 273 of the EIS/EIR.) Also, the ramp touch-down itself would be signalized, which would actually improve access to the Clocktower garage by providing additional breaks in traffic, facilitating movements such as left turns into the garage from Second Street southbound.

B. Existing and Potential Future Traffic Congestion in the Vicinity (Clocktower, Bird, Rogers, Paglietti, Caramia, SOMA Rose, Alexander, Lord, Leibovitz, Hempel, Design, Baldwin, Pell, Chow, Kaliski, Matsoukis)

Most of the traffic data provided in the EIS/EIR and used as the basis for the EIS/EIR analysis was collected in the fall of 1992 through 1993 because that is when preparation of background technical reports began. Data was used to understand existing traffic patterns, to provide a baseline for comparison, and to validate the traffic simulation model used to estimate and analyze future traffic conditions. While the actual traffic data is in some cases now three years old, it can still be considered a valid representation of baseline traffic conditions upon which to build future forecasts because there have been few changes either in terms of major traffic generators or the transportation network in the intervening years. The validity of the data is especially true considering all the temporary street closures and traffic detours that have been implemented near the Embarcadero because of construction activities. For example, the closure of Mission Street northbound and Howard Street east of Steuart

Street, and the prohibition of left turns from the northbound Embarcadero onto Howard and Mission Streets, have affected circulation in that area, and 1992 (pre-construction) travel patterns are more closely aligned with future conditions, than existing travel patterns which include detours and etc. Furthermore, the EIS/EIR is intended to provide a comparison between future alternatives, and between future, past, and existing conditions. All scenarios within the traffic simulation model are "built" from one set of data, and the traffic simulation model is validated using that data, so that the relationships or comparisons are valid even if the "existing" data has somewhat aged.

As explained in Section 4.5.1 Traffic (pages 265-340), traffic congestion in the vicinity of the Clocktower, as represented by the level of service (LOS) of area intersections, is heavy at times, with the Second/Bryant and the Second/Harrison intersections reaching LOS D in the PM Peak Hour. Some of this congestion will be relieved in the future under the Alternatives with the proposed HOV operation on Essex Street due to surface street changes: Harrison Street would become one-way westbound, west of First Street, eliminating the eastbound approach at the Second Street intersection; and the northbound approach of Second Street at Harrison would be restriped to eliminate the right turn lane. Under the No Build Alternative, the LOS at Second/Bryant is projected to improve to LOS B. Under build alternatives which propose new ramps to/from the mainline freeway, the LOS at Second/Harrison is also projected to improve to LOS B. (See Table 4.5-2, page 273.)

When comparing Alternatives Three and Five with Alternative Four and the Preferred Alternative, PM peak hour traffic on Harrison Street in the vicinity of the new on-ramp would increase, in the first case, by between 250 and 500 vehicles. Vehicles accessing the new on-ramp would all be east of Second Street, and the number of vehicles traveling west on Harrison, between Second and Fourth Streets would be less than under alternatives without the on-ramp (including the No Build). Under the Second Street Option of Alternatives Three and Five, Second Street northbound traffic between Bryant and Harrison Streets would be approximately 450 vehicles higher during the AM Peak Hour, and about 200 vehicles higher during the PM Peak Hour than during the same periods under Alternative Four or the Preferred Alternative. Traffic in the southbound direction would be approximately the same under either of these alternatives.

(Rogers) Based on average speed data obtained from the San Francisco County Transportation Authority for the years 1992 and 1993 as part of the Congestion Management Program, average travel times between the intersections of Broadway/Van Ness and Second/Bryant was approximately 20 to 25 minutes. The shorter time was via Broadway/Embarcadero/Harrison, while the slightly longer time was via Van Ness/Bryant. There is insufficient data available for a 1995 travel time comparison, although it is likely that construction along the Embarcadero has affected travel times on that route.

The widening of the I-80 eastbound Fourth Street off-ramp under Alternative Three (Fourth Street Option) and the Preferred Alternative would only affect the freeway mainline. The elevated deck would be widened up to 12 feet between Sixth Street and the top of the Fourth Street off-ramp. The existing three-lane configuration at the bottom of the ramp would remain unchanged.

(Bird) One objective of this project is to encourage transit usage in the Embarcadero corridor. All of the project alternatives, including the no build, assume that the F-line would be constructed in the roadway median.

11.4.3 General Comments Regarding Existing and Projected Future Automobile Traffic, including the Incident Analysis (Rogers, Baldwin, Clocktower, Chester, Schmaltz, Sierra Club, SFT, SFTA, SFRA, Hestor, MUNI, SFRA, Goodenough, Letunic, Maletic, Chow, Koga)

A. Incident Analysis (SFRA, MUNI, Chester)

(SFRA) Occurrences of "incidents" (usually accidents or stalled vehicles on the Bay Bridge, Bay Bridge approaches, or East Bay freeways) are by their nature unpredictable. As stated on page 146 and page 296 of the EIS/EIR, the City's Department of Parking and Traffic estimates that "incident" conditions occur 25 to 30% of the time in the PM Peak. This estimate is based on observations of queuing on the First Street corridor since the 1989 earthquake. Pre-earthquake data regarding the frequency of non-"normal" queuing on the Embarcadero Freeway and the Terminal Separator Structure is not available, although extensive queuing is known to have occurred from time to time.

Just as the historical frequency of incident conditions in the pre-earthquake period is unknown, the future frequency of incident conditions is impossible to predict. Nonetheless, potential queuing under future incident conditions is described on pages 303-307, and depicted in Figures 4.5-11, 4.5-12, and 4.5-13 of the EIS/EIR. Intersection level of service is also discussed (pp. 299-303 of the EIS/EIR). This information is provided so that members of the public and decision-makers can judge whether one alternative or group of alternatives would be able to function better than others under incident conditions.

Thus, the incident analysis provides one criteria that may be used to evaluate the relative effectiveness of project alternatives; however, it should not be construed as a prediction of "normal" traffic conditions in the future. Future "normal" traffic conditions have been predicted using conservative travel projections as described on pages 265-267 of the EIS/EIR. Similar to environmental analyses conducted for projects throughout the Bay Area, these travel projections were derived from the regional MTC travel demand model, and when distributed to local streets represent *reasonable* "worst case" traffic volumes appropriate for analysis of future transportation, air quality, and socioeconomic issues.

Construction activity on local street- and ramp-approaches to the Bay Bridge has the potential to increase the frequency of incident conditions for the duration of construction activities. The only project-related construction in these areas would be surface street changes on First Street in all build alternatives, and changes to Essex Street in Alternatives Three and Five. These construction activities would be of limited duration (approximately 20 working days on First Street and ten working days on Essex Street). Caltrans' Bay Bridge Seismic Retrofit project could also increase the frequency of non-"normal" queuing on First Street (i.e. "incident" conditions).

Clearly, traffic congestion worsens during incident conditions and some traffic movements are constrained. The Department of Parking and Traffic has installed six cameras at critical intersections to identify potential congestion spots and to be able to promptly dispatch parking control officers to those locations. This process is expected to continue through the upcoming year, and is consistent with assumptions regarding incident conditions. General observations indicate that through traffic can cross congested corridors in most instances (i.e. total "gridlock" does not occur), and that the worst back-ups occur on side streets when vehicles try to turn onto the congested corridor rather than crossing all the way through the intersection. Thus the statement on page 298, which refers to the back-ups related to cars turning from cross streets onto congested corridors, is generally consistent with other statements regarding the incident analysis and cross traffic.

(MUNI) As stated above, and on page 146 and page 296 of the EIS/EIR, the City's Department of Parking and Traffic (DPT) estimates that "incident" conditions occur 25 to 30% of the time in the PM Peak. This estimate is based on observations of queuing on the First Street corridor since the 1989 earthquake. DPT has observed queues extending from the Bay Bridge on-ramp to Mission Street about 30% of the time in the PM Peak, and extending to Market Street and beyond about 25% of the time.

Also explained above, the traffic analysis presented in the EIS/EIR uses conservative travel projections derived from the regional MTC travel demand model, and when distributed to local streets, represent reasonable "worst case" traffic volumes appropriate for analysis of future transportation, air quality, and socioeconomic issues. Therefore, it would be incorrect to say that the non-incident transportation analysis contained in the EIS/EIR reflect "optimal" conditions, except inasmuch as it assumes that traffic signals will be optimally timed, that cross traffic will be able to proceed through any intersection, and that commuters will learn to select the fastest route to their destination.

As stated on page 296 of the EIS/EIR: "Given the high volume-to-capacity ratios estimated at the downtown on-ramps, those intersections in the vicinity of the ramps would quickly deteriorate to less than acceptable conditions (LOS E or F) in the case of an accident or stall on the Bay Bridge, or in the case of slightly greater traffic volumes (on the freeway or on local streets) than those projected to occur under normal conditions." Thus, while there is not a hard line between "normal" and "incident" conditions, the non-incident analysis presented in the EIS/EIR does not represent the "optimal" end of the spectrum, suggested by the commenter.

It should be noted that drivers who commute regularly through the area tend to recall their worst experiences, and not their best. Any objective diary of queuing conditions would result in findings similar to DPT's.

(Chester) Similar to commuter traffic, freight movement to the southern piers from the north would be affected under incident conditions, when queuing is projected along the Embarcadero. This queuing would not occur under non-incident conditions, and would not affect freight movement occurring outside of peak periods.

(Schmalz) The PM peak hour level of service calculations shown in Table 4.5-2 on page 271, and the demand-to-capacity analysis conducted as part of the freeway analysis indicate that future congestion at all four eastbound on-ramps would be similar, with the Fifth Street on-ramp, the one farthest away from the Financial District, being slightly lower than the other on-ramps..

Alternatives One, Two, Four and the Preferred Alternative tend to separate eastbound and westbound travel paths while Alternatives Three and Five tend to merge some of them along Harrison Street resulting in somewhat higher levels of congestion at some intersections such as Harrison Street/First Street or Harrison Street/Essex Street.

B. Congestion Management Program (CMP) Roadway Network (SFTA)

San Francisco's designated CMP Network includes the following primary arterials within the Primary Study Area analyzed in the EIS/EIR: The Embarcadero, Davis, Drumm, Broadway, Washington, Clay, Pine, Bush, Market, Mission, Howard, Folsom, Harrison, Bryant, Brannan, Steuart, Main, Beale, Fremont, First, Third, Fourth, Fifth, and Sixth Streets. The EIS/EIR provides comprehensive AM and PM peak hour Level of Service (LOS) analysis for all intersections on each arterial designated for the local CMP Roadway Network for pre-earthquake, existing, and future Year 2015 conditions for each alternative within the Primary Study Area. In addition, average travel speeds for the AM and PM peak hours for each scenario are provided for the most congested arterials designated for the local CMP Roadway Network. Within the Primary Study Area, LOS analysis for all scenarios is also provided for other important streets not included in the local CMP Roadway Network, such as New Montgomery, Second, Spear, Battery, Sansome, Front, and California Streets, as well as for segments of Brannan, Main and Beale Streets beyond the local CMP Roadway Network. In addition, the EIS/EIR provides LOS analysis for a Secondary Study Area for critical intersections which are part of the local CMP Roadway Network including O'Farrell Street and Columbus Avenue. In summary, the EIS/EIR comprehensively addresses, predicts, and mitigates deficiencies on the designated local CMP Roadway Network in a broadly defined study area.

C. Future Travel Projections and Mode Split (SFRA, Sierra Club, Clocktower, Baldwin, Chow, Koga, Rogers, Goodenough, Letunic, SFT)

As stated on page 155 of the EIS/EIR, the number of vehicle trips entering and exiting the primary study area in the peak hours has decreased since the earthquake (by about 18% in the AM and about 16% in the PM), probably because drivers who used to go through the study area, now use alternate routes to their destinations. For example, a pre-earthquake driver going from the East Bay to the intersection of Broadway and Polk Street, would have had the option of using the TSS and Embarcadero Freeway to the Broadway exit, and then going west on Broadway to their destination. Under existing conditions, the same driver might use the Eighth Street exit from I-80 or the Mission Street exit from US 101, and then go north to Broadway via Ninth and Larkin Streets or via Van Ness Avenue.

Future travel forecasts were developed using the regional Metropolitan Transportation Commission (MTC) travel demand model, as explained on page 265 of the EIS/EIR. This regional model, which is used for environmental analyses conducted by agencies and jurisdictions throughout the Bay Area, bases its future employment forecasts on projections prepared by the Association of Bay Area Governments (ABAG). As explained in Section 4.1.3 2015 Employment Forecast and Projected Development (pages 245-251), the ABAG 92 (Revised) Projections inherent in the MTC model anticipate that total employment in San Francisco will reach 683,150 by 2010. Based on an extension of the ABAG projections, total employment in 2015 is estimated at 686,100, for a gain of 130,010 jobs over the 22 year forecast period from 1993. Within the greater downtown area, employment levels are projected to increase by about 64,650 to a total of around 459,900 in 2015, despite the decrease in employment in the C-3 (Downtown-Commercial) districts between 1985 and 1993.

Within the downtown study area, the projected increase in future employment would lead to an increase in daily person trips. Some of these new trips would be by private automobile, and some would be by transit or other modes. Overall, the percentage of trips by transit is projected to increase slightly to about 55% in 2015; this is due to a number of factors unique to urban areas, including high transit availability, traffic congestion, parking costs, and the potential for greater telecommuting in the future. The potential shift from automobile or transit modes to walk and/or bicycle cannot be quantified because these two modes are not part of the MTC travel forecasting model, which focuses on motorized trips only. On the other hand, it is unlikely that the current split between motorized and non-motorized trips will change substantially in the future. The selection of walking and/or bicycling as a transportation mode, is more dependent on the distance to be traveled rather than traffic congestion or parking costs. Also, there is an assumption within the model that parking will be available (although expensive) in downtown San Francisco. This assumption appears consistent with the 1991 occupancy rate of 70.4% in greater downtown, which showed an unused supply (see EIS/EIR page 185).

In addition to reflecting potential future development by incorporating ABAG employment projections, the MTC travel demand model assumes completion of all transportation projects (including transit extensions) currently programmed in the State Transportation Improvement Plan (STIP), such as the BART and CalTrain extensions. Other, unfunded transit proposals are not assumed, just as potential non-employment-based trips resulting from possible future projects such as the Mission Bay sports and entertainment complex are not inherent in the projected daily person trips. (This is why some of these projects are described separately on pages 329-340 of the EIS/EIR.) The parking structure proposed as functional replacement for the Port's parking displaced by the project is also not inherent in the MTC model, but it is reflected in the EIS/EIR analysis via manual assignments of peak hour vehicle trips. Manual assignments were necessary because the parking garage was analyzed as a potential feature of the current project.

As demonstrated in results of the study cited by the commenter (Sierra Club), the MTC travel model is sensitive to assumptions regarding future transit improvements and the growth and distribution of employment and housing. By using regionally accepted employment and housing projections, as well as assumptions regarding programmed transit improvements, the MTC model and the EIS/EIR analysis are reasonably conservative and do take into account factors referred to such as use of home work sites, higher parking fees, etc. (SFT) Also taken into account is how "transportation works in the minds of most people" and how individuals choose the easiest mode of transportation, and the easiest route, between their origin and destination. (Letunic) To make these base assumptions more aggressive (i.e. to assume more telecommuting and higher transit use) would be inconsistent with the purpose of the

EIS/EIR analysis, which is to show potential impacts of project alternatives under reasonable "worst case" conditions. Also, since it is impossible to objectively measure or predict neighborhood "frustration" with traffic, the EIS/EIR appropriately focuses on quantitative measures related to potential traffic congestion, noise, and air quality effects. (SFT, Letunic)

(Baldwin, Chow, Koga, Clocktower, et al.) All future transportation improvements that are likely to occur in the City before the year 2015, such as the reopening of the I-280 freeway and the reconstruction of the King Street ramps, the realignment of the Embarcadero and King Street, the opening of MUNI's Metro Extension, and the extension of CalTrain to downtown San Francisco, are already incorporated into the set of future assumptions used to develop future traffic conditions in the City. As explained above, the basis for future travel demand estimates is MTC's travel demand forecasting model which already includes planned transportation improvements, therefore, the results of the EIS/EIR traffic analysis, both for the street network and for the freeway system, reflect such changes and the associated shifts in travel.

The new I-280 on- and off-ramps at King Street and the CalTrain extension to downtown San Francisco near the Transbay Terminal have been included as part of the future transportation network under all future project alternatives when conducting future travel demand estimates and mode split, and establishing future travel paths to and from the regional freeway system.

(SFRA) The 23% future growth in daily person trips produced in or attracted to the project area presented on page 9 of the EIS/EIR refers to both auto and transit trips. As indicated, most of the growth would occur in daily transit trips (30%), while daily auto person trips would experience a lesser growth (15%).

On page 266 of the EIS/EIR, it is indicated that the increase in the number of peak hour vehicles entering or leaving the study area as a whole would be about 18% in the AM and 10% in the PM.

The statement on page 420 of the EIS/EIR correctly indicates that there would not be substantial differences between the existing and the predicted future traffic conditions at specific noise receptor locations. While the projected increase in peak hour vehicle trips entering or leaving the study area as a whole is about 18% in the AM and 10% in the PM, the corresponding increases at individual noise receptor locations are not projected to be substantial enough to cause perceptible increases in the noise level (less than 3 dBA) at these receptors.

D. Hyde Street Changes (Hestor)

As noted on page 154, traffic outside the project study areas has also changed since the earthquake, and generally reflects a redistribution of vehicle trips that were formerly made via the Embarcadero Freeway, the TSS, or other earthquake damaged facilities such as the Central Freeway. Hyde Street is an example of a route which has experienced some change as a result of the earthquake, and the Department of Parking and Traffic (DPT) estimates that traffic on Hyde Street at Turk Street has increased by about 30% since the earthquake. DPT staff attributes this increase more to earthquake-related changes to the Central Freeway, than to loss of the Embarcadero Freeway and the TSS.[9]

No additional change in volumes on Hyde Street is anticipated as a result of project alternatives, although Hyde Street continues to have available capacity, and at a public meeting regarding the supplemental Chinatown analysis referenced in responses above, members of the public suggested that Hyde Street be signed as an access route to the freeway in order to encourage its use by drivers leaving Chinatown or other neighborhoods in the northeast quadrant of the City. The proposed signing could slightly increase traffic volumes on Hyde Street.

11.4.4 Freeway Traffic

A. Freeway Congestion as a Result of the Second Street On- and Off-Ramps (Clocktower, Paglietti, Caramia, Baldwin, Gott, Design, Pell, Chow, Kaliski, Koga, Matsoukis)

The Second Street off-ramp under the Second Street Option of Alternatives Three and Five would serve a projected 900 vehicles per hour in the AM Peak, and about 300 vehicles per hour in the PM Peak. The off-ramp approach would include two left-turn lanes and a right-turn lane. With a proceed (green) phase of 30 seconds (50% of the traffic signal cycle), typical AM peak hour queues at the signalized intersection at the bottom of the ramp would be about three vehicles per lane. Vehicles would extend back about 60 feet from the end of the ramp. Since the new off-ramp is approximately 800 feet long, those vehicles waiting at the signal would not affect the freeway mainline traffic bound for the Bay Bridge. Conditions associated with being the "Last SF Exit" would be no different than existing conditions associated with the Fourth Street off-ramp, or pre-earthquake conditions associated with the TSS.

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[9] Jack Fleck, San Francisco Department of Parking and Traffic, Memo to Hillary Gitelman, November 27, 1995, p 3 A copy of this memo is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street

In regard to changes in freeway congestion due to the new Second Street off-ramp, Table 4.5-11 (page 314) of the EIS/EIR indicates that average speeds on the mainline are projected to be the same in the eastbound direction, whether or not the Second Street off-ramp is constructed. During the AM peak period, average mainline speeds would be about 12 mph; while PM peak period average mainline speeds would be about 13 mph in both the Fourth Street and Second Street Options of Alternatives Three and Five. Freeway speeds in the westbound direction would differ slightly, depending on whether or not the Second Street on-ramp is constructed. For alternatives with the on-ramp, average mainline speeds would be about 23 mph in the AM Peak Period, and 13 mph in the PM Peak Period. For alternatives without the Second Street on-ramp, average mainline speeds would be about 25-35 mph in the AM Peak Period, and about 20-32 mph in the PM Peak Period.

The results of the traffic analysis indicate that Second Street would not be congested because an additional northbound lane would be provided between Bryant Street and Folsom Street under the Second Street Option of Alternatives Three and Five. About 900 vehicles per hour would use the Second Street off-ramp in the AM peak (when lower levels of congestion would occur on Second Street north of the off-ramp) with approximately 85% turning left, while about 300 vehicles would exit during the PM peak hour, approximately 40% turning left. To minimize congestion at the Bryant Street/Second Street intersection and facilitate southbound traffic flow, left turns from Second Street onto Bryant Street would be prohibited during the AM peak period.

Table 4.5-11 of the DEIS/DEIR (page 314 of the EIS/EIR) corresponds to Table 2.44 (page 145) and Table 2.47 (page 151) of the Transportation Technical Report. They present, among other data, average mainline freeway speeds for the entire length of the I-80 freeway study area, that is, from Treasure Island to the Central Freeway merge in the westbound direction, and from the Army Street interchange to the Bay Bridge in the eastbound direction.

On the other hand, Tables 2.45 (page 147), 2.46 (page 149), 2.48 (page 153), and 2.49 (page 155) of the Transportation Technical Report present I-80 freeway subsection speeds; that is, speeds on the freeway mainline between each pair of ramps (either on or off). Therefore, there is no discrepancy between the data presented in the two sets of tables; they show different information.

B. Freeway Operations Analysis (Chester, Schmaltz)

(Schmaltz) The balanced distribution of PM peak hour eastbound traffic among the four possible on-ramps (First, Essex, Sterling and Fifth) was considered when conducting the traffic analysis. A balanced distribution of traffic does not mean that all on-ramps carry the same number of vehicles, rather that their levels of congestion, measured by the level of service (delay) at the nearby intersection or by the demand-to-capacity ratio at the on-ramps, are similar. This approach which represents the actual manner in which drivers distribute themselves among the different ramps is also affected by the trip origin, i.e. north versus south of the freeway or east versus west of Second Street.

(Chester) Although it is true that freeway traffic conditions outside the study area may affect freeway traffic in downtown San Francisco, the freeway study area shown in Figure 4.5-14 on page 309 of the EIS/EIR, which approximately covers from Army Street to Treasure Island incorporates the major potential bottlenecks, i.e., the U.S. 101/1-80 junction, the on- and off-ramps, and the Terminal Separator Structure (TSS).

C. Projected Traffic on the Fremont Street Off-Ramp (Alameda)

The length of the modified Fremont off-ramp proposed in Alternatives Three, Four, and Five and the Preferred Alternative would be about 1,200 feet between Fremont Street and the point where AC Transit buses would split off to access the Transbay Terminal. The ramp would contain two lanes, except for the last 300 feet near Fremont Street where four stacking lanes would be provided. (If the ramp is constructed in a "Y" configuration as shown in Figure 4.2-2 Option A on page 257 of EIS/EIR, the four lanes would be on separate arms of the ramp structure.) The total queuing area would therefore be about 3,000 lane-feet. This amount of space could store approximately 120 cars (at 25 feet per car). Traffic model data indicates that maximum queue lengths during the AM peak would be 13 cars per lane and during the PM peak, 10 cars per lane. These values are only a fraction of the storage capacity on the ramps so that even on extremely heavy traffic days, the queue is unlikely to back up to the Transbay Terminal split. One reason for the short queue lengths on the ramp is that autos turning left onto Fremont Street would continue to have a free left turn (no red signal phase), just as under existing conditions, which would keep traffic flowing smoothly.

11.4.5 Transit

A. Passenger Loading at the Ferry Building (GGBHTD, Port, SFRA)

(SFRA) Within the discussion of patron access to transit vehicles on page 354 of the EIS/EIR, the term "transit vehicle loading" refers to the process of entering or exiting a transit vehicle. In contrast, "transit loads," as discussed on page 332, refers to the number of riders per transit vehicle. This distinction has been clarified by modifying the text on pages 354-357 to use the terms "transit access," "passenger loading," and "transit bus stops."

(GGBHTD) As stated on page 355 of the EIS/EIR, future demand for bus stop areas at the Ferry Building is projected to require two dedicated spaces for Amtrak buses, and two to three spaces to be shared by Golden Gate Transit and MUNI. As originally designed, the project would have constructed two 200-foot long loading bays immediately in front of the Ferry Building, which could each accommodate about three buses or about 10 automobiles. Because of the deficiency of bus passenger loading space identified on page 356, for all build alternatives except the Preferred Alternative, the mitigation measure on pages 365-367 would be included for those alternatives, and would increase the amount of passenger loading space provided. Consistent with this mitigation measure, the current feature for the Preferred Alternative includes a 268 meter (880 foot) long bus passenger loading zone immediately in front of the Ferry Building (Figure 4.5-14A, page 366). This amount of loading is expected to satisfy the anticipated demand for such space. All bays within this passenger loading zone would be under the jurisdiction of the Port of San Francisco, although the City would designate sufficient curb space within this zone for four to five transit bus stops. The Port could also designate space within the passenger loading zone for automobile loading and parking.

To be consistent with the current project design, the text of the mitigation measure on pages 365-367 (and repeated in the summary, pages 17-18) has been modified.

(Port) Implementation of the bus passenger loading mitigation measure would have urban design effects as described for the Preferred Alternative in Section 4.3 Urban Design.

Also note that the topic of this mitigation measure is transit access and passenger loading. Loading bays along the northbound lanes of the Embarcadero roadway and immediately in front of the Ferry Building are not proposed for bus parking. As stated on page 357 of the EIS/EIR, it is anticipated that the Port of San Francisco will have to take reasonable efforts to manage loading activities in the vicinity of the Ferry Building, regardless of whether the current project is implemented.

B. Existing and Projected Future Transit Service and Delay (Alameda, GGBHTD, MUNI, SFRA, SFT,)

(SFRA) As explained on page 346 of the EIS/EIR, delays to transit vehicles are anticipated in the future regardless of whether or not the current project is constructed. Also, there would be less delay under the build alternatives than with the No Build alternative. Thus, the increase in delay would be due to background growth, and not due to the project itself. This explanation is consistent with the statement on page 332, which says that the build alternatives would not increase average bus delays. The discussions on page 346 note that bus delay and load factors will increase compared to today's conditions, but for the year 2015, the build alternatives improve overall transit delay compared to the No-Build condition in that year. In terms of individual locations (i.e. intersections and street segments) under the build alternatives, some locations are better than the year 2015 No-Build, while others are worse.

(MUNI) In order to reflect MUNI's proposed re-routing of the 15-Third bus line off of Bush, Battery, and First Streets, and the potential relocation of the 12 and 42 bus lines off of Battery Street, the following paragraph has been added to the bottom of page 341:

"Due to frequent congestion on Battery, bush, and first Streets, MUNI has begun the process of rerouting the 15 Third Street bus line onto Clay, Davis, and Beale Streets. A proposal to allow restricted two-way operation of Sansome Street between Washington and Bush Streets by creating a southbound shared bus/commercial vehicle lane has been incorporated in the Preferred Alternative. MUNI is also examining the possibility of moving the 12 and 42 lines off of Battery Street, and is evaluating several alternate routes. for future rail service to Chinatown/North Beach, the Preferred Alternative also calls for a rededication of a portion of Block 203 to public right-of-way to preserve this option."

In addition, the following sentence has been added to the last paragraph on page 346: "If the Route 15 is re-routed as currently proposed by MUNI, delay experienced along Clay, Davis, and Beale Streets would be similar to delay experienced by Route 1, which uses the same streets." Also, the following statement has been added to the bottom of Table 4.5-17: "Does not reflect re-routing of the 15-Third bus route."

Other future transit modifications involving changes to street operations may be implemented as a result of MUNI's ongoing operations planning activities which provides regular monitoring and assessment of conditions in the field.

(GGBHTD) The transit analysis focused on the worst conditions during the peak commute hours, and did not undertake an hour-by-hour analysis of congestion levels on the shoulders of the peak or at other times of day. The suggestion that transit-only lanes operate just during the peak hours follows existing City practices. Additional hours of operation for these lanes may be worthwhile, but this decision would ultimately have to be made by the City (possibly in consultation with GGBHTD), and would probably not be made until traffic conditions are assessed after the project is built.

(Alameda) The freeway speed data supporting the calculation of AC Transit bus delay is shown in the paragraph in question. This data can also be found in Table 2.45 of the Transportation Technical Report dated November 22, 1994 and revised May 15, 1995. These speeds are shown for both the 2015 No-Build where no project improvements are made as well as for the build alternatives. As can be seen from this data, the No-Build alternative has about the same freeway speeds in the year 2015 as the build alternatives, which indicates the slowing from existing conditions is entirely due to traffic increases. The additional changes introduced by the Mid-Embarcadero and related freeway ramp improvements do not result in significant additional slowing of the freeway. The reference to Table 4.5-8 in the fourth paragraph of page 334 in the Draft EIS/EIR should have been to Table 2.45 of the Transportation Technical Report. This reference has been changed to Section 4.5.1.5 at p. 360 in the EIS/EIR.

C. Transit First: Avoid Conflicts with Transit; Re-examine Moveable Transit Lanes (Rolfe, SFT)

(SFT) The relocated transit island on Fremont Street at Market Street would be for bus passenger use only. No streetcar stop is planned at this location. The First Street improvements proposed would relocate the streetcar tracks in the second lane from the left. During peak periods, an exclusive transit lane would be created on the left side of the streetcar track on First Street for buses utilizing the loading/parking lane, and auto traffic would be allowed to share the streetcar lane. During off-peak periods, buses and streetcars would operate in the exclusive transit lanes as currently. The proposed changes in First Street would not preclude future use of the streetcar track, although service would be affected if street cars shared a lane with auto traffic, as proposed in peak periods. This proposal is being re-examined because of the potential impacts on transit of creating a shared rail/traffic lane. One option under consideration is to retain the second lane from the left as a transit lane, either by use of the variable message overhead sign during peak periods or by making the lane a permanent exclusive transit (diamond) lane. A variation which provides an exclusive bus/rail lane adjacent to the east curb passing lane is also under consideration to ensure transit service is not affected by potential traffic delays.

The service period for F-Line (page 171) has been modified to indicate that F-Line now operates daily from early morning to late night.

The traffic volumes on each of the noted streets (First, Second, Fourth, Battery, and Bush Streets) are projections developed through analysis of roadway conditions for each project alternative. A comparison between the No Build Alternative and the Preferred Alternative is presented below.

Traffic Volumes at Selected Locations
AM/PM Peak Hours
(Vehicles Per Hour)

	Base Year (92/93)	No Build (Alternative 1)	DPT Variant
First Street, north of Folsom Street	1,410/1,620	1,430/1,760	1,620/1,730
Second Street, north of Folsom Street (both directions)	1,110/1,400	1,270/1,440	1,350/1,770
Fourth Street, north of Howard Street	1,220/1,760	1,320/1,570	1,330/1,610
Battery Street, north of Bush Street	1,160/1,200	1,100/1,400	1,280/1,320
Bush Street, west of Battery Street	610/460	660/450	690/470

Source: Korve Engineering, Inc.

(Rolfe) No new on- or off-ramps are proposed on Fourth Street. In the Fourth Street Option of Alternatives Three and Five, and the Preferred Alternative, widening of the existing Fourth Street off-ramp is proposed as an alternative option to constructing a new off-ramp at Second Street. The proposed ramp improvements would partially restore the ramp capacity and freeway access that existed before the Loma Prieta Earthquake.

11.4.6 Pedestrians and Bicycles

A. Potential Effects on Pedestrian Activity on Second Street and Vicinity (Clocktower, Design, Lowe, Paglietti, Lang, Caramia, Gott, Baldwin, Pell, Chow, Kaliski, Koga, Matsoukis)

Pedestrian counts at crosswalks at three intersections along Second Street were taken in 1994, and characterize existing pedestrian volumes along the Second Street corridor.[10] These volumes are shown below, along with level of service designations. (For a description of the level of service ratings, see Table 4.5-19 on page 376 of the EIS/EIR.)

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[10] For additional information on pedestrian volumes, for information on additional intersections, or for more information on the analysis of pedestrian conditions, see the August 25, 1995 Transportation Technical Report referenced in the Draft EIR. A copy of this report is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street.

Existing Pedestrian Volumes and Flow Regimens (Level of Service) at Intersections along Second Street

Intersection and Crosswalk Location	Existing Noon Peak Hour Ped. Volumes	Pedestrian Flow Regimen (LOS)
Second & Folsom		
N side of Folsom	160	open
E side of Second	550	unimpeded
S side of Folsom	450	unimpeded
W side of Second	420	unimpeded
Second & Harrison		
N side of Harrison	180	unimpeded
E side of Second	210	unimpeded
SE corner island	160	unimpeded
S side of Harrison	50	open
W side of Second	260	unimpeded
Second & Bryant		
N side of Bryant	65	open
E side of Second	200	unimpeded
S side of Bryant	190	unimpeded
W side of Second	230	unimpeded

Source: Parsons Brinckerhoff Quade & Douglas, Inc.

The pedestrian volumes, which range between about 200 and 550 pedestrians per hour in the noon peak hour, and about 200 and 500 pedestrians per hour during commute periods at crossings of Bryant, Harrison, and Folsom, confirm that pedestrian activity exists along Second Street, and at amounts that are higher than many South of Market locations. Volumes of about 200 to 260 pedestrians per hour occur at Harrison and Bryant Streets, despite the proximity of the mainline freeway, which passes overhead between Harrison and Stillman Street, where there is currently no pedestrian crossing.

In the future, pedestrian volumes in the vicinity are expected to rise, and would reach about 300 to 600 pedestrians per hour at the same crossings.[11]

In general, pedestrian safety in urbanized areas is more a function of roadway and pedestrian facility design than of traffic volumes. Nonetheless, increased traffic volumes marginally increases the potential for automobile/pedestrian conflicts in situations such as mid-block pedestrian crossings, intersections where vehicles are permitted to turn right-on-red, freeway off-ramps, tow-away lanes immediately adjacent to congested pedestrian facilities, non-standard signal phases, and congested intersections where turns are permitted.

Under Alternatives Three and Five, a new on-ramp to the south/west bound mainline freeway would be located on Harrison Street, just east of Second Street, and would pass-over Second Street to join the elevated mainline. Traffic accessing this ramp would be east of Second Street, and would not add to traffic on Second Street or increase the potential for automobile/ pedestrian conflicts along that street. The ramp structure itself would be approximately 11 meters or 36 feet wide, and when combined with the existing mainline freeway (which is about 18 meters or 60 feet wide), would represent a 60% increase in the width of overhead structures that pedestrians traveling along Second Street would have to cross under. While this increase could be intimidating to some pedestrians, it is more likely that pedestrians who object to passing under freeway overpasses already avoid this area.

Under the Second Street Option of Alternatives Three and Five, a new off-ramp from the eastbound mainline freeway would be constructed, and would descend along Stillman Street, touching down across Second Street from the Clocktower building, between Harrison and Bryant Streets. The north sidewalk along Stillman Street would be eliminated, reducing the area devoted to pedestrians in the vicinity. The new off-ramp would introduce additional traffic to the vicinity, with projected off-ramp volumes of about 900 vehicles in the AM peak hour, and about 300 in the PM peak hour. In peak and off-peak periods, some vehicles would likely approach the cross walk at the end of the off-ramp at high speed, and the addition of turning vehicles would increase the possibility for automobile/pedestrian conflicts. Second Street would distribute traffic coming off the ramp, (i.e. traffic turning onto Second Street from the new ramp would distribute itself by turning off Second, onto Harrison, Bryant, Folsom, or some other street), and would also have an increased potential for conflicts. Specific changes in turning volumes under the Second Street Option of Alternatives Three and Five when compared to the No Build Alternative are shown below.

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[11] Parsons Brinckerhoff Quade & Douglas, Table 5.4 of the Transportation Technical Report, prepared for Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure, August 25, 1995, p. 241. A copy of this report is available for public review in the project case file at the San Francisco Planning Department.

AM AND PM PEAK HOUR TURNING VOLUMES AT INTERSECTIONS ALONG SECOND STREET

AM Peak Hour

	No		Alt.		Net Change	
	Build		3A/5A			
	LEFT	RIGHT	LEFT	RIGHT	LEFT	RIGHT
Howard Street	344	132	316	116	-28	-16
Folsom Street	294	136	220	122	-74	-14
Harrison Street (wb)	148	64	192	76	44	12
Harrison Street (eb)	44	24	0	0	-44	-24
Stillman Street off-ramp	0	0	734	118	734	118
Bryant Street	458	136	272	130	-186	-6

PM Peak Hour

	No		Alt.		Net Change	
	Build		3A/5A			
	LEFT	RIGHT	LEFT	RIGHT	LEFT	RIGHT
Howard Street	488	68	468	92	-20	24
Folsom Street	224	274	238	292	14	18
Harrison Street (wb)	132	38	162	56	30	18
Harrison Street (eb)	52	40	0	0	-52	-40
Stillman Street off-ramp	0	0	114	186	114	186
Bryant Street	270	154	136	164	-134	10

Source: Korve Engineering, Inc. and Parsons Brinckerhoff Quade & Douglas, Inc.

Even with the new off-ramp, and with the increase in turning volumes as a result of the ramp, volumes and levels of congestion in the vicinity would not exceed amounts commonly accepted in urban areas, and common at intersections with high pedestrian volumes throughout downtown San Francisco. For this reason, and because the change in peak hour turning volumes would range from 734 in AM to 186 in PM, the increased potential for automobile/pedestrian conflicts would not be considered substantial, although it could be a factor which decision makers will consider when selecting or rejecting the Second Street Option.

Increases in traffic on the Second Street corridor might mean that some pedestrians would choose other routes to their destination, although traffic volumes and turning volumes along Third and First Streets are also high, and First Street does not connect between Harrison and Bryant Streets. The increase in the potential for conflicts might also mean that some pedestrians would choose other modes of transportation, although it would be difficult to quantify this shift.

B. Potential Pedestrian and Bicycle Effects in Other Areas (Port, SFRA, Sierra Club, Letunic, JPB)

(Sierra Club, Port) In general, pedestrian signals are timed based on a standard walking speed of 4 feet/second. This means that after the "Walk" signal, and during the flashing "Don't Walk" phase, a pedestrian is given one second for every four feet of crosswalk. In some areas of the City, the Department of Parking and Traffic has attempted to increase the "Walk" phase such that the combined "Walk" and flashing "Don't Walk" phases are based upon 2.5 feet per second. In the paired roadway configuration proposed in Alternatives Two, Three, and Four traffic signals at most intersections along The Embarcadero would be timed to permit pedestrians traveling at 4 feet per second to cross the entire roadway in one signal phase. At some locations, such as the Washington Street intersection, and at mid-block crossings, pedestrians would have to cross the roadway in two phases. Refugee areas in the median would be available for waiting. The split roadway configuration proposed in Alternative Five and in Preferred Alternative would be timed similarly, except that at Market Street the north and southbound lanes of the Embarcadero would be crossed independently, during different "Walk" phases. The text of the EIS/EIR has been modified on pages 19 and 379-380 to describe this condition. (Also, see Response 11.4.6C below.) Temporary and permanent signs would be provided on the Embarcadero roadway proper to direct pedestrians to appropriate landing facilities in the immediate area.

(JPB) The proposed project would not generate pedestrian trips, but would affect the size and location of certain pedestrian facilities (mostly sidewalks along the Embarcadero). Thus, pedestrian effects of the project would be more severe when combined with the CalTrain extension project and other related projects only if increases in pedestrian trips associated with those other projects occurred at precisely one of the locations where the proposed project would reduce the width of a sidewalk. No sidewalk narrowing is proposed at the potential terminal location being considered for the CalTrain extension. Also, the analysis summarized on pages 377-380 of the EIS/EIR assumed 2015 pedestrian volumes would be higher than existing pedestrian volumes at most locations. As stated on pages 375-376, growth factors were based on expected employment, and were adjusted by adding pedestrians associated with new transit passenger trips described in Section 4.5.2 of the EIS/EIR. However, additional pedestrian trips associated with a new CalTrain terminal could potentially change the projected level of service for pedestrian facilities in the immediate vicinity of the terminal site and their impact will be addressed in the analysis for the CalTrain extension project.

(Letunic) As described beginning on page 378, with one exception all build alternatives would narrow existing sidewalks at the following locations: the west side of the Embarcadero, south of Broadway; the west side of the Embarcadero, across from Piers 3 and 5; the west side of the Embarcadero, immediately north of Mission Street; the east side of Third Street, at Market Street; the east or west side of Bryant Street, at the Embarcadero. The one exception would be under the Preferred Alternative the sidewalk south of Broadway would be 3.6 meters (12 feet), wider than existing width. Also, the north sidewalk along Stillman Street would be eliminated under the Second Street Option of Alternatives Three and Five. At other locations, sidewalk widths would be widened or would remain the same.

The entire length of the Mid-Embarcadero project includes extra-wide, 15-foot outer traffic lanes in both directions to allow for bicyclists. Bicycles should use the roadway and not the sidewalks, so any narrowing of the sidewalks should not impact bicyclists. Reopening Davis Street between Washington and Clay Streets would open an existing street right-of-way used as a pedestrian path to shared pedestrian/bicycle/auto use. The change might help separate pedestrians from bicyclists.

(Port) The City's planning standards call for a minimum 15-foot sidewalk along the west side of The Embarcadero. However, the section of The Embarcadero just south of Broadway, is site constrained due to the existing building on the southwest corner. This, plus the need for three traffic lanes in each direction, double left turn lanes for northbound The Embarcadero onto Broadway, and the two Muni F-Line tracks in the median make the sidewalk narrowing necessary. However, a 3.6 meter (12 feet) sidewalk is provided between Pier 5 and Broadway in the Preferred Alternative.

(SFRA) Figure 4.1-5 is correct; there would be a crosswalk across The Embarcadero between Mission and Market Streets at the location of the Muni F-Line entrance into the Embarcadero median. As described in Section 2.2, Alternatives Description (pages 58-104), the mid-block pedestrian crosswalks on The Embarcadero would be signalized in all build alternatives, just like the street intersections would be. Pedestrian, transit, and other vehicular traffic at the mid-block crosswalks would be separated by different signal phases. Detailed phasing and timing plans will be developed for each location during project design phase to eliminate any potential conflict among different modes of travel.

C. Split Roadway in front of the Ferry Building (GGBHTD, Levin, Maletic, Port)

(GGBHTD, Port) In the split-roadway configuration for the Embarcadero proposed in Alternative Five, the proposed project would incorporate the mitigation measure included on page 252 of the EIS/EIR. This mitigation measure would eliminate intrusions into Justin Herman Plaza, a 4(f) resource, by narrowing the plaza area between the northbound and southbound lanes of the roadway. As stated on page 252, this measure would also eliminate the possibility of an F-Line turn-around loop within the plaza. Thus, under Alternative Five, pedestrians going from Justin Herman Plaza to the Ferry Building, would cross the southbound lanes of the roadway and reach a pedestrian storage area in the plaza in one signal cycle. In another signal cycle, the pedestrians would cross two side-by-side F-line tracks and the northbound lanes of the roadway. There would also be a pedestrian storage area between the F-Line tracks and the northbound lanes, to accommodate pedestrians in that area. The Preferred Alternative also features a split roadway configuration in front of the Ferry Building; therefore, pedestrians would cross the roadway in the same manner as under Alternative Five.

To address concerns expressed regarding the crossing time for pedestrians at the Ferry Building, the traffic signals for the paired-roadway configuration proposed in Alternatives Two, Three, and Four, would be timed to allow most pedestrians sufficient time to cross the northbound and southbound lanes and the F-line tracks in one signal cycle where possible. At some locations, for example at Washington Street, and at mid-block crossings, a two phase signal would be required. There would be pedestrian storage areas between the F-Line tracks and the southbound and northbound lanes, to accommodate pedestrians in those areas. The text on pages 19 and 379-380 of the EIS/EIR has been modified to reflect this design.

(Maletic, Levin) From an urban design perspective, and from the viewpoint of a pedestrian, an argument can be made in favor of both the split and paired roadway configurations, and some members of the public prefer one configuration, while other members of the public prefer the other. Descriptions of both configurations, along with descriptions of the pedestrian crossings (time and distance), are provided above and in the EIS/EIR. Further discussions regarding which configuration is the "superior design solution," and which creates the best pedestrian experience, would be subjective and beyond the scope of the EIS/EIR. Please note that subsequent to a series of public hearings, the San Francisco Board of Supervisors selected a locally preferred alternative on January 29, 1996, which features a split roadway configuration for the Mid-Embarcadero portion of the project.

11.4.7 Parking (Paglietti, Gordon, Caramia, SOMA Rose, SFRA)

A. Parking Jurisdiction and Changes in Parking Supply (SFRA)

As explained on page 181 of the EIS/EIR, three public agencies are responsible for managing on- and off-street parking within the focused and primary study areas, either with their own personnel, or through contracts with private vendors. These agencies include the Port of San Francisco, the San Francisco Department of Parking and Traffic, and the California Department of Transportation (Caltrans). In addition, there are private parking lots and garages in the area managed by private individuals and organizations. While policies of the Bay Conservation and Development Commission (BCDC) affect the location of parking within their jurisdiction (just as policies of the San Francisco Master Plan affect the location of parking throughout the City), BCDC does not itself manage parking (and nor does the San Francisco Planning Department).

Table 3.3-10 on page 184 of the EIS/EIR is intended to show changes that have occurred in the on- and off-street parking supply since the 1989 earthquake, and particularly changes that have occurred in that portion of the supply managed by the Port of San Francisco. To clarify Table 3.3-10, the rows titled "On-Street City Spaces" and "Off-Street City Spaces" have been changed to "Other On-Street Spaces," and "Other Off-Street Spaces."

B. Parking Displacement vs. the Economic Effects of Parking Displacement (SFRA)

Section 4.5.3.1 of the EIS/EIR (pages 367-371) analyzes projected parking displacement as a result of project alternatives. Section 4.6.6 of the EIS/EIR (pages 406-417) analyzes potential economic effects as a result of that parking displacement. For clarification, the following sentence has been added to page 370: "With implementation of the traffic mitigation measure described on page 322, up to about 76 on-street parking spaces would also be displaced near the intersection of Harrison and Fourth

Streets." Also, the title of Section 4.6.6 Parking Displacement, has been changed to "Potential Economic Effects of Parking Displacement."

C. Parking Displacement South of Market Street (SOMA Rose, Gordon, Paglietti, Caramia)

As shown in Table 4.5-18 (page 368), a total of about 88 on- and off-street parking spaces would be lost in the vicinity of the Second Street off-ramp proposed in the Second Street Option of Alternatives Three and Five. Fifty-five of the spaces that would be displaced are located in a parking lot partially under the mainline freeway; this lot is owned by Caltrans and leased to a private operator. Thirty-three of the displaced spaces would be curb-side spaces along Stillman and Second Streets. No change in the number of parking spaces in the vicinity would occur due to the on-ramp proposed in both options of Alternatives Three and Five. Also shown in Table 4.5-18, about 300 off-street parking spaces would be displaced by the Fremont Street off-ramp realignment proposed under Alternatives Three, Four, Five and the Preferred Alternative.

Displacement of 88 parking spaces near Second and Stillman Streets and 300 spaces at the Fremont off-ramp site would inconvenience area residents, employees, and visitors who are accustomed to parking at these locations, and would increase competition for other on- and off-street spaces in the area. In a survey of parking spaces conducted by the San Francisco Planning Department in 1991 and described on page 185 of the EIS/EIR, the overall occupancy rate of on- and off-street parking spaces in the general South of Market area was determined to be about 71%, implying that sufficient vacant spaces exist to absorb the shift in demand associated with the displacement of these spaces. It should be noted that within the context of San Francisco, which is an urban environment well served by regional and local transit operators, the loss of parking in and of itself would generally not be considered a significant environmental effect, regardless of the relationship of parking demand to parking supply. Certainly an inconvenience, the loss of parking generally forces some drivers to find parking farther from their destination than anticipated, and causes some drivers to consider shifting to alternative modes of transportation. There is no evidence that these inconveniences or considerations would make the South of Market area less attractive to businesses, and no specific businesses have been identified for which the loss of parking in the south of Market area would constitute an economic effect necessitating compensation.

11.4.8 Construction Period Transportation Issues (Bird, Paglietti, Caramia, SOMA Rose)

The off-ramp proposed in the Second Street Option of Alternatives Three and Five would take about 15 months to construct. The on-ramp proposed in Alternatives Three and Five would take about 21 months to construct. As described on pages 320-321 of the EIS/EIR, temporary lane reductions on Second, Third, Fourth, and Harrison Streets might be required during construction, but would be limited to off-peak periods, and lane reduction on different streets would take place on different days. Pedestrian and vehicle access to all residences and businesses in the vicinity would be maintained. Traffic congestion could increase due to reductions in lane width and construction truck traffic. This potential impact is described on pages 319-321 of the EIS/EIR. While certainly an inconvenience to area residents, employees, and visitors, the potential increase in traffic congestion would be temporary, and in and of itself would not constitute a substantial physical environmental change.

11.4.9 Transportation Mitigation Measures (GGBHTD, Port, MUNI)

A. Construction Traffic on the Embarcadero (Port)

As stated on page 319 of the EIS/EIR, the preliminary stage construction plan prepared for the project proposes to construct the Embarcadero roadway, between Folsom Street and Broadway in two stages. Each stage would last approximately eight months. During each stage, construction would be restricted to one-half of the roadway, with the other half available for three lanes of traffic in each direction between Howard Street and Broadway. Thus, no reductions in the capacity of the Embarcadero are anticipated in this area.

To clarify this point, the following sentences have been added to the mitigation measure on page 14 of the EIS/EIR: "Three traffic lanes will be maintained in each direction along The Embarcadero between Broadway and Howard Street at all times. If unanticipated reductions in capacity are required on the Embarcadero for some reason, such reductions would be of short duration and would occur in off-peak or night-time hours (i.e. between 6 p.m. and 6 a.m.)" This measure has also been included on page 328.

It should be noted that the construction impacts along the Embarcadero corridor under the build alternatives were analyzed assuming construction of the F-Line track bed in the roadway median would follow completion of both the northbound and southbound roadways. The City is evaluating an alternative phasing approach which would advance F-Line construction prior to completion of the roadway. Under this alternative approach, only two traffic lanes could be maintained in each direction during construction and as a result, the construction impact would be more severe than described on page 319 of the EIS/EIR.

Consistent with standard construction practice, City would require that construction areas be posted with signs, notifying drivers about the construction activity.

B. Pedestrian Flows at the Ferry Building during Construction (Port)

A mitigation measure addressing pedestrian flows in the vicinity of the Ferry Building (including ferry patrons) during the construction period is included on page 386 (and repeated on page 20 of the summary). This measure, which is independent from the transit mitigation measure addressing bus stop locations, would be included in the project, and would require a construction plan to maintain maximum pedestrian facilities and provision of temporary facilities as appropriate. Access would be maintained to nearby businesses, including ferry services, and temporary signs would be used to indicate paths of travel to transit parking, ferries and businesses. Permanent signs to transit, parking, ferries or businesses on Port property are beyond the scope of the current project, but could be implemented by the Port.

C. Changes to Transit Routes and Transit Stops (MUNI and GGBHTD)

Under existing conditions, transit-only lanes are provided on First and Fremont Streets, between Market and Mission Streets. Under the build alternatives, additional peak-period transit lanes would be provided on First Street, as shown in Figure 2-2D (page 71) In the Chinatown/North Beach Area Improvement Program developed by the City staff, a shared bus/commercial vehicle lane will also be implemented southbound on Sansome Street between Washington and Bush Streets in the Preferred Alternative. In all cases, the advisability of adding transit-exclusive lanes, whether for peak periods or all the time, must be balanced against potential impacts, such as decreased capacity for non-transit vehicles, increased congestion in non-transit lanes, and/or elimination of curbside parking and loading. In some cases, it is possible that impacts would cancel-out the benefits, since frustrated drivers would seek to bypass congested areas by violating the transit-only signs, or frustrated drivers of trucks or autos would stand at the curb, disregarding "No Stopping" signs. For all of these reasons, the current project does not propose to provide additional exclusive transit lanes on Howard, Folsom, Fremont, or Battery. The current project would not preclude provision of exclusive transit lanes, however, if the GGBHTD and MUNI were to propose and implement such lanes on heavy transit corridors in conjunction with the City's Department of Parking and Traffic. Prior to implementation, a thorough analysis of potential impacts and likely benefits would be required.

11.5 Responses to Comments on Other Environmental Effects

11.5.1 Land Use and Employment Projections

A. "Rebirth" of the SOMA Neighborhood and Potential Effects of the Second Street On- and Off-Ramps Proposed in Alternatives Three and Five (Clocktower, Meader, Mathews, Bement, Lord, Port, Design, Bird, Gordon, Rogers, Caramia, SOMA Rose, Baldwin, Lang, Lowe, Pell, Burkhart, Chow, Kaliski, Koga, Matsoukis)

As described on page 140 of the EIS/EIR, the portion of the South of Market area that surrounds Second Street and South Park (see Figure 3.1-4, page 138) contains a variety of land uses. Many older warehouses and industrial buildings in the area have been converted to residential use or to use as "live/work" units, while others are used by small businesses.[12]

As suggested by several commenters, the area was originally a residential neighborhood where the wealthy of San Francisco made their homes. Around 1865, two large public works projects, the "Long Bridge" and the "Second Street Cut," opened-up the Southern waterfront for industrial development, and Nob Hill became a more exclusive address. In the years that followed, the South Beach/Rincon Hill/South Park area became mostly industrial, with a small remnant of residential housing, mostly devoted to working people, including seamen.

With establishment of the Rincon Point-South Beach Redevelopment Area (1981), the Rincon Hill Special Use District (1985), and the South of Market Zoning Controls (1990), non-industrial uses in the vicinity have increased in recent years, along with the number of residents in the area. Between 1980 and 1990, the number of housing units increased from 7,845 to 10,363 in the greater South of Market area, while the number of residents increased from 19,586 to 22, 089.[13] This increase in residential population, along with the opening of restaurants, retail stores, and galleries cited by some commenters, could be considered by some a neighborhood "rebirth' or "renaissance."

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[12] Live/work units, as defined by the San Francisco Planning Code, are considered a commercial use in San Francisco, even though they incorporate residential and non-residential components. Colloquially referred to as "lofts," live/work units can accommodate a wide variety of commercial, industrial, or arts-related activities, and many are located in older structures

[13] US Census data for census tracts 178, 180, 226, 227, 607, and 179.01 (South of Market and Mission Bay areas), San Francisco Planning Department District Summaries, 1993.

Many commenters suggested that this "rebirth" or "renaissance" would be threatened by Alternatives Three and Five, which would introduce a new on-ramp to I-80 /101 towards the Peninsula originating at Harrison Street, just east of Second Street and passing over Second Street to connect to the mainline freeway. The Second Street Option of Alternatives Three and Five would also construct an off-ramp from I-80 eastbound, that touches down at Second and Stillman Streets. The Preferred Alternative which proposes to improve the capacity of the existing Fourth Street off-ramp instead of adding new ramps at Second Street, would provide a balance between improving accessibility to existing northeast San Francisco commercial area and neighborhoods and protecting the character of this emerging residential neighborhood.

Comments which cite specific environmental or social concerns regarding the proposed ramp structures are addressed under separate subheadings, by topic (pedestrian activity, the Clocktower building and its driveway, parking, visual and social effects, local traffic conditions, freeway traffic, noise and air pollution, need for the ramps, and construction period effects).

B. In Chinatown, Consider Nature of Uses Adjacent to Streets with Increased Traffic Flow, as it Relates to the Capacity of Those Streets (Hestor)

As discussed on pp. 387-389 of the EIS/EIR, since the 1989 earthquake, there has been an increase in traffic accessing Chinatown via local streets (the volumes crossing Market Street have increased considerably). Correspondingly, the number of vehicles accessing north of Market from the waterfront via Washington Street and Broadway has decreased substantially due to the removal of the Washington Street and Broadway ramps. This has resulted in a reduction in the number of vehicles on the streets accessing ramps, namely Broadway, Washington and Clay Streets. It should be noted that west of Chinatown, eastbound traffic on Broadway during the AM peak hour has increased due to additional motorists using Broadway to commute into downtown, while westbound traffic has decreased by approximately the same amount. Traffic from east/west streets east of Powell and north/south streets north of Pacific Avenue has decreased slightly due partially to the removal of the freeway ramps. Traffic volumes on Hyde Street south of Turk Street has increased approximately 200 to 400 vehicles per hour.

In the supplemental Chinatown study, traffic volume comparisons conducted by the Department of Parking and Traffic were reviewed and supplemented by additional volume comparisons at intersections within Chinatown. Overall, traffic volumes at intersections within Chinatown have not changed substantially. The most substantial increase has been on Stockton Street southbound, with increases of approximately 50 to 100 vehicles at Market Street. However, traffic operating conditions in Chinatown have been affected by localized congestion (due to a large extent to double parking) and congestion at Union Square and the downtown core which spills back into Chinatown on Stockton, Kearny and Montgomery Streets.

In large part, congestion along Stockton Street is due to the Street's very nature as a neighborhood shopping district, with all its associated characteristics: truck loading, high pedestrian volumes at crosswalks, and occasional double parking. The supplemental Chinatown analysis identified parking and traffic enforcement as the best way to address congestion levels on Stockton Street between Broadway and Market Street. The Department of Parking and Traffic has agreed to implement this and other recommendations of the supplemental Chinatown analysis as soon as possible.

C. Coordination Regarding the Roadway's Edge (Port)

As stated on page 111 of the EIS/EIR, the mid-Embarcadero portion of the proposed project would require approval of the Port Commission, and Port Commission Resolution 87-96 specifies guidelines for review, approval, and mitigation of public-agency sponsored projects on Port lands. The mitigation measure on page 252 (and repeated in the summary, page 9) is intended to ensure coordination with the City's Recreation and Park Department, which has no jurisdiction or approval authority over the Embarcadero roadway, but has jurisdiction over immediately adjacent property. The mitigation measure on page 9 and on page 252, has been expanded to include the following sentence: "Design and construction of the portion of roadway adjacent to Block 202 would also be coordinated with the Port of San Francisco, which has jurisdiction over a portion of the block."

D. Employment Projections (Schmaltz)

As stated on page 245, the employment projections used in the EIS/EIR analysis are based on forecasts published by the Association of Bay Area Governments (ABAG), which anticipate growth in Bay Area and San Francisco employment by 2010. Because the horizon year of the EIS/EIR is 2015, the ABAG projections for the Primary Study Area were further extended into the future, based on an estimate of reasonable development at or near vacated freeway parcels. While projections used for the Mission Bay EIR and the Downtown Plan EIR have been more aggressive than ABAG forecasts, and while some may disagree with the ABAG-based numbers, the future projections used represent a reasonable estimate of employment and population growth, and ABAG forecasts are generally accepted as the basis of environmental analyses by agencies and jurisdictions throughout the Bay Area.

The EIS/EIR does not conclude that "because no new significant projects have been identified for the district at this time, no provision should be made for increased commuter traffic in the district due to future growth in employment." The EIS/EIR analysis assumes background growth in employment over time, and the transportation analysis is based on those assumptions. Despite the fact that the project itself would not be growth-inducing, as described on pages 508-510, all of the project alternatives are analyzed in the future year of 2015 to determine how they would impact (and how they would function with) future cumulative increases in automobile traffic. (See Section 4.5.1.1, particularly Future Travel Forecasts, pages 265-267.)

11.5.2 Visual and Social Effects of New Overhead Ramps at Second Street (Clocktower, Design, Caramia, Baldwin, Chow, Burkhart, Kaliski)

The Second Street Option of Alternatives Three and Five would construct an on-ramp extending over Second Street, and an off-ramp ending at Second Street, across from the Clocktower building. The on-ramp would increase by about 60% the width of the existing overpass on Second Street, while the off-ramp would eliminate the sidewalk along the north side of Stillman Street. As described on pages 254-256 of the EIS/EIR, the new ramp structures would be smaller and less visually intrusive than the ramps that existed prior to the 1989 earthquake and demolition of the Terminal Separator Structure, and would not be substantially obtrusive within the context of pre-earthquake and existing freeway structures in the vicinity.

As explained in Response 11.4.6 A, Potential Effects on Pedestrian Activity on Second Street and Vicinity, pedestrian volumes in the vicinity of Second Street are expected to rise in the future, to about 300 to 600 pedestrians per hour at the crossings of Bryant, Harrison, and Folsom Streets. If the new ramp structures proposed in Alternatives Three and Five were constructed, some pedestrians could use alternate routes, although it is likely that pedestrians who object to passing under freeway overpasses already avoid this area, and traffic volumes and turning volumes along possible alternate routes are high.

For a discussion of the Clocktower building's status as a significant architectural resource, see Response 11.5.6 A, Second Street Off-Ramp would Terminate at the Clocktower's Driveway.

11.5.3 Air Quality

A. South of Market and in General (Paglietti, Caramia, SOMA Rose, Goodenough, SFRA)

The air quality data gathered for 1993 are not used in the analysis of potential impacts on air quality from the project alternatives in the future. The "old" air quality data provides some background information about the project area. The data for 1993 were the most recent data available during the preparation of the air quality analyses. More recent air quality data summaries for 1994 are available and they are presented below:

AIR POLLUTANT DATA SUMMARY (1991-1994): HIGHEST MONITORED CONCENTRATIONS - ARKANSAS STREET MONITORING STATION[1]

		YEAR			
POLLUTANT	Averaging Time	1991	1992	1993	1994
		ppm[2]	ppm	ppm	ppm
Ozone	1-hour	.05	.08	.08	.06
Carbon Monoxide[3]	8-hour	6.5	6.4	5.1	4.4
Nitrogen Dioxide	1-hour	.10	.09	.08	.09
Sulfur Dioxide	1-hour	.04	.04	.04	.05
Particulate Matter (PM_{10})[4]	Annual (geometric mean)	30	28	25	25

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[1] Source: CARB, 1992, 1993, 1994.

BAAQMD, 1995. "Air Pollution in the Bay Area by Station and Contaminant - Annual Summary."

[2] Parts per million

[3] BAAQMD (1985, updated 1991), isopleth analyses used to more realistically represent existing CO levels than reported Arkansas Street CO concentrations.

[4] Units of measurement are micrograms per cubic meter (ug/m^3).

Also, note that carbon monoxide exhaust emissions per mile per vehicle tend to improve (decrease) over time, so that older data presents a worse or more conservative picture. Carbon monoxide emissions per mile per vehicle from the traffic used in the analysis of 1993 carbon monoxide concentrations decreased by seven percent in 1994. Carbon monoxide exhaust emissions per mile per vehicle for 1995 decreased by 14 percent from 1993. These emission estimates were calculated using the Caltrans exhaust emission model (EMFAC7Fv1.1).

As stated on page 205, motor vehicles are the main source of carbon monoxide (CO) in the San Francisco Bay Area, generating over 70 percent of CO emissions. No violations in the Federal or California Ambient Air Quality Standards for CO were measured at the Bay Area Air Quality Management District's (BAAQMD's) Arkansas Street monitoring station during 1991, 1992, 1993, or 1994. Computer simulations of carbon monoxide emissions from vehicle exhaust showed that no violations of carbon monoxide air quality standards would occur when the project (any alternative) would be built in the year 2000, or in the future year 2015. Analysis locations are shown in Figure 4.8-1 on page 433 of the EIS/EIR, and analysis results are shown in Tables 4.8-2, 4.8-3, and 4.8-4 on pages 435-440. The analysis methodology is explained in the background technical report cited on page 430 of the EIS/EIR, and in a separate air quality protocol that was reviewed by staff of Caltrans, the Metropolitan Transportation Commission (MTC), and the BAAQMD.[14]

Eleven receptor locations in the vicinity of the off-ramp proposed in the Second Street Option of Alternatives Three and Five were included in the analysis. Modeled one hour average CO concentrations ranged from 11 to 8.1 parts per million (ppm) under existing conditions in the AM and PM peak hours. Year 2015 average concentrations for the peak hours under all alternatives were projected at between 8.7 and 4.8 ppm. (The Federal standard is 35 ppm; the California standard is 20 ppm.) Modeled eight hour average CO concentrations ranged from 6.9 to 5.3 ppm under existing conditions. Year 2015 eight-hour average concentrations were projected at between 4.8 and 3.4 ppm under all alternatives. (The Federal and California standard is 9 ppm.) Even under year 2000 conditions, when the project would be complete, but auto emission factors would not reflect all the improvements expected by year 2015, no exceedences of the Federal or State standards were projected. (See Table 4.8-6, pages 445-446.)

Air quality standards were designed to protect the public health and welfare. Computer modeling of carbon monoxide emissions show that at some locations the build alternatives would have higher concentrations of carbon monoxide than under no build conditions. The opposite was also found to be true, and some locations would have higher carbon monoxide if no project was built. Again, in all instances the carbon monoxide concentrations associated with traffic from the building alternatives would be below Ambient Air Quality Standards. Based on these analysis results, air pollution in the vicinity of the Second Street ramps proposed in Alternatives Three and Five would not create unhealthful conditions, and CO levels are actually projected to decrease over time due to improvements in automobile emissions.

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[14] Jonas & Associates Inc. "Protocol; Air Quality Impact Analysis; Terminal Separator Structure/Mid-Embarcadero Replacement Project," April 28, 1994. A copy of this protocol is available fro public review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

B. Construction Period Effects (Paglietti, Caramia, USEPA)

(Paglietti, Caramia) The construction of the project (all build alternatives) would occur in phases. Construction would not occur in any one location for the entire two year period. The construction emissions presented in Tables 4.8-7 (page 451) and 4.8-8 (page 452) of the EIS/EIR would likely be a worst-case scenario. Many conservative assumptions were made for the calculation of these emissions. One assumption was that every day, the entire area to be constructed during a particular construction stage would undergo construction activity. Additionally, equipment exhaust emissions were calculated for the peak activity day for each construction stage. In actuality, the expected emissions would be below those presented in the EIS/EIR.

(USEPA) To reduce airborne toxics and dust generation during construction, the mitigation measures listed on page 453 of the EIS/EIR would be implemented as part of the project, and referenced in the Record of Decision (R.O.D.). Additional public notification may be included in the Site Mitigation Plan referred to on pages 499. This Site Mitigation Plan would also be implemented as part of the project, and referenced in the R.O.D.

With implementation of these mitigation measures, construction activities would not result in unhealthfull conditions due to airborne pollutants.

C. Cumulative Air Quality (USEPA)

The air quality analysis contained in the EIS/EIR considers potential air quality effects associated with project construction and operation. As described in the response immediately above, construction-period effects would be reduced to less than significant levels through implementation of mitigation measures. Due to its concurrent construction schedule, these mitigation measures would also be implemented during F-Line construction and construction of the parking garage proposed on Block 202 (if included in the project). Also as described immediately above, the construction emissions presented in Table 4.8-7 9 (p. 451) and 4.8-8 (p. 452) were calculated for the worst-case scenario assuming concurrent construction activities from all of these projects in the project area.

The analysis of air quality effects due to project operations was based on projected future emission factors and future traffic conditions. Future traffic conditions assume background or cumulative growth in the region, as well as underground parking garage on Block 202, with up to 600 parking spaces, and the air quality analysis thus addresses future cumulative conditions. (See p p. 415 and 430 of the EIS/EIR.)

11.5.4 Noise

A. South of Market (Paglietti, Caramia, SOMA Rose, Goodenough)

As stated on page 197, the noise environment of San Francisco is dominated by motor vehicle noise. In the vicinity of Second Street, where freeway ramps are proposed in Alternatives Three and Five, existing noise levels are dominated by freeway traffic, as well as traffic on local streets in the vicinity. At three receptors in the area, including the Clocktower building, average daily noise levels (L_{dn}) were measured at between 76 and 83 dBA. 83 dBA was the highest noise level measured anywhere in the project area.

An accepted traffic noise model (SOUND 32) was used to project future noise levels in the vicinity, and results of this analysis are presented in Table 4.7-2 and 4.7-3 (pages 421-422). As shown in these tables, average daily noise levels in the area are projected to increase between one and two dBA in the future under all project alternatives, including Alternative One, the No Build. Thus, any increase in noise in this area as a result of the project or cumulative increases in traffic would generally be imperceptible (an increase of three or more dBA would be necessary to be perceptible). Existing noise levels in the vicinity of the Clocktower are high and will remain so in the future because of its close proximity to the freeway. Noise levels inside the Clocktower building are assumed to be consistent with the requirements of Title 24, which stipulates an L_{dn} of 45 dBA or less. The anticipated change in noise level at the Clocktower is 1 dBA or less which would only be experienced on the Second Street side of the building. This change in the ambient noise environment would be imperceptible and would result in an insignificant change in the interior noise levels at the Clocktower.[15]

B. In General and Along the Embarcadero (SFRA)

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[15] Noise Technical Report prepared for this project *by Wilson, Ihrig & Associates, April 19, 1995* A copy of this report is available for public review in the project casefile at the San Francisco Planning Department, 1660 Mission Street, San Francisco

Acronyms

A footnote defining acoustical terms (e.g., L_{eq}) has been added to the noise discussion on page 417 of the EIS/EIR.

Perceptible Change In Noise

A 3 dBA change is the threshold difference in noise level that would be perceptible. Changes in ambient noise level of less than 3 dBA are normally not perceptible to the average person. Thus, increases in noise levels would be perceptible where they reach 3 dBA, and the text cited by the commenter is correct.

Bippidy Bop Child Care Center

The Bippidy Bop Pre-school is located at 121 Spear Street. The closest noise receptor with a similar exterior noise environment included in the project noise study is Rincon Tower located between Spear and Steuart Streets on Howard. The change in the exterior noise environment at 121 Spear would be similar to that at Rincon Towers. The projected change in the noise environment at Rincon Towers for the alternatives studied is either no change or a 1BA decrease in ambient noise.

Other

The outdoor land use at Ferry Building is aptly characterized by several other nearby receptors studied (e.g., Receptors 11 and 12). The reference to outdoor land use at Receptor 14 (Rincon Towers) and Receptor 15 (Hill Brothers Plaza) would appear to be to the common terraces located on the 5th and 6th floors at these receptors. Although these areas may be used from time to time, "frequent outdoor use" is normally taken to mean recreational use that occurs regularly (i.e., on a day-to-day basis) such as in parks or at tennis courts.

Table 3.5-1 has been amended to refer the reader to Table 4.7-1 which indicates what the various FHWA/Caltrans Activity Categories are.

As stated on page 234, the EIS/EIR analysis uses two baselines for comparison: pre-earthquake and existing conditions. Where an impact would be more severe when compared with one baseline as opposed to the other, that comparison is emphasized. While unusual, the inclusion of the older, pre-earthquake baseline does not prejudice or distort the results of the analysis, because existing information is also provided. In addition, the pre-earthquake information is useful to those who consider the project a "replacement" for the Embarcadero Freeway and the Terminal Separator Structure.

C. Construction Period Noise Effects (Bird, Paglietti, Caramia, SOMA Rose, SFRA)

Construction impacts in general, and construction related noise impacts in particular, are by definition temporary, and are generally experienced intermittently at various times during any construction process. As stated on page 426 of the EIS/EIR, construction of the current project is expected to take between 20 and 21 months, and would involve the use of heavy equipment, jackhammers, and other noise-generating devices. Pile driving may be required where new ramps or modifications to existing ramps are proposed. Pile driving would not be required near the site of the following projects cited by the commenter: the MUNI Metro Turnback project, the Ferry Terminal Project, the Ferry Building project, the MUNI-F-Line project, the Mid-Embarcadero Open Space Project, the Rincon Point Park project, and the Gap Headquarters project.

Typical noise levels associated with construction equipment are shown in Figure A-1 (page A-8) of the Noise Technical Report, which is cited on page 426 of the EIS/EIR and is available for public review in the project case file at the San Francisco Planning Department. In general, noise levels decrease the farther the listener is from noise-generating activities, and the more barriers that come between the listener and the noise source. Construction of the current project would be subject to the San Francisco Noise Ordinance, and would also comply with the noise mitigation measure included on pages 427-429 of the EIS/EIR, which would specifically require that project contractors maximize physical separation, as far as practical, between noise generators and noise sensitive receptors, pre-drill piles where soil conditions permit, and take other steps as specified to minimize potential disturbances due to construction-related noise.

In light of all these factors, construction noise associated with the current project, while it would certainly inconvenience those in the vicinity of noise-generating activities, would not substantially affect the long-term noise environment. When considered together with other ongoing and potential construction projects in the vicinity, the current project would add to the general level of inconvenience and annoyance experienced along the waterfront and in the South of Market area. However, noise levels from every project would not be additive in the sense that all projects would not be constructed in the same place, at the same time, and at the same distance from any one listener or group of listeners

The above argument should not preclude the commenter (the San Francisco Redevelopment Agency) from considering potential cumulative construction noise effects or mitigation measures associated with Agency projects in close proximity, such as Rincon Point Park and the Gap Headquarters building.

D. Cumulative Noise Effects (Goodenough)

Transportation, air quality, and noise sections of the EIS/EIR are based on future travel projections which incorporate estimates of future population and employment growth, and therefore present the potential effects of past, existing, and reasonably foreseeable future (i.e. "cumulative") development. Thus, the operational noise effects described on pages 419-424 represent potential cumulative effects in the vicinity of the Clocktower building.

The only potential noise source not included in these discussions on pages 419-424 is the planned light rail and historic street car service along the Embarcadero. For this reason, Section 4.7.3 "Cumulative Noise Levels," examines receptors along the Embarcadero that might be affected by noise levels due to the project and to cumulative increases in population and employment plus those associated with planned MUNI service.

The Land Use Compatibility Guidelines within the Environmental Protection Element of the San Francisco Master Plan, cited on page 418 of the EIS/EIR, are advisory, and similar to other objectives and policies of the Master Plan, are not enforceable regulatory standards. These guidelines also do not specifically address roadway improvements, but imply that noise conditions should be considered prior to citing specific land uses.

The noise analysis appropriately focuses on projected changes in the noise environment, and concludes that noise increases due to all project alternatives and to projected cumulative increases in traffic would not be perceptible (i.e. would be less than 3 dBA) near the Clocktower building. Imperceptible increases in noise levels (i.e. "slight increments") could not have health or safety consequences, and could not substantially change the existing environment.

E. Noise Mitigation Measures (SFRA)

As stated above, the Land Use Compatibility Guidelines within the Environmental Protection Element of the San Francisco Master Plan, cited on page 418 of the EIS/EIR, are advisory, and similar to other objectives and policies of the Master Plan, are not enforceable regulatory standards. Development of

Rincon Point Park is a provision of the Rincon Point - South Beach Redevelopment Plan and would not be prohibited or constrained by existing or projected future noise levels.

As shown in Tables 4.7-3 and 4.7-4, noise levels in the vicinity of the Rincon Point Park site (Receptor 15, Hills Bros. Plaza) were measured at about 69 dBA, and are projected to increase to 70 or 71 dBA regardless of the future roadway alternative selected (including the no build alternative). This projected increase would not be perceptible to human ears, and therefore could not be considered a substantial environmental effect requiring an analysis of feasible mitigation measures.

As stated on page 427 of the EIS/EIR, Caltrans and FHWA require that feasible noise abatement measures be considered wherever certain noise criteria are exceeded, regardless of whether a substantial increase in noise levels would occur, and therefore regardless of whether noise mitigation would be required to reduce or eliminate environmental effects. Consistent with Caltrans and FHWA policy, noise abatement was considered for the Rincon Point Park location, and rejected because it would restrict visual access to the waterfront, conflicting with the project's purpose and need.

To clarify that noise mitigation and noise abatement are in this case, two separate things, the heading of Section 4.7.5 Noise Mitigation, has been changed to Noise Abatement Measures and Noise Mitigation.

11.5.5 Hazardous Materials and Hydrology (Goodenough, USEPA)

(Goodenough) Numerous soil and groundwater investigations were conducted to satisfy the requirements of Article 20 and to determine appropriate methodologies for handling and disposal of soil and groundwater potentially generated during implementation of one of the build alternatives. It is true that the most recent investigation referenced in the DEIS was completed in 1993. However, since the results of the investigations have determined that hazardous substances may be encountered in any of the project subareas, all activities relating to soil and groundwater management will be conducted as if all materials contained hazardous substances. This approach is the most conservative and protective of people and the environment. Additional sampling of subsurface soils and/or groundwater prior to implementation of one of the build alternatives would not provide additional protection to workers, the public, or the environment. In addition to the material discussed in this Response, below, see Responses 11.5.9 A and B.

USEPA) Cumulative Impacts

The comment expresses concerns regarding potential cumulative effects associated with erosion, urban runoff, and hazardous materials in excavated soils resulting from this project and other related and reasonably foreseeable projects. As a general response, and as indicated in the EIS/EIR, the analysis for all issues has taken into account all reasonably foreseeable related project in this area. Analysis of these other related projects has been included at both the construction level, and future operational level, to the extent possible given the amount of detail known about those projects at this time. In some instances, conservative assumptions were made about these related projects in order to present a conservative cumulative impact analysis.

More specifically, the concerns regarding erosion, urban runoff, and hazardous materials have been addressed by the following amendments to the EIS/EIR text:

Erosion: (Inserted on page 479) "The potential cumulative effects associated with erosion of exposed soils at related nearby projects include off-site sedimentation, blockage of storm water conveyance systems resulting in localized flooding, and effects to water quality in the Bay. Each of the nearby projects which may contribute to a cumulative effect by exposing soils to erosion would be required to comply with the terms of the General Permit, just as the proposed project must comply, as discussed above.

For each project, submittal of a Notice of Intent to comply with the General Permit would be required by the State Water Resources Control Board. Compliance with the terms of the General Permit, including the preparation and implementation of a SWPPP, would reduce or eliminate erosion and transport of soil off-site."

(Inserted on page 480): "No cumulative effects related to soil erosion on water quality in the Bay would be expected since runoff from all excavation projects on the inland side of the Embarcadero Roadway would be collected by the City's combined sewer system and treated at the southeast water pollution control plant prior to discharge. No additional mitigation would be required."

Urban Runoff: (Inserted on page 472): "Potential cumulative effects to surface water quality resulting from planned nearby projects, as well as the potential parking garage at Block 202, would be eliminated since, under normal circumstances, virtually all urban runoff within the City is collected in the combined sewer system and treated prior to discharge."

Hazardous Materials in Excavated Soils: (Inserted on page 497) "Potential cumulative effects of excavation, handling and disposal of soils containing hazardous substances at planned nearby and related projects may include 1) potential extended exposure of construction workers that are employed at more than one of the projects; 2) potential extended exposure of the public to fugitive dust that may contain contaminants; 3) use of landfill capacity at a time when landfills are reaching capacity and siting new landfills is increasingly difficult.

The duration of worker exposure is considered in site-specific health and safety plans. Permissible exposure levels refer to concentrations of substances and represent conditions under which it is believed that nearly all workers may be repeatedly exposed day after day without adverse effects. Therefore, proper implementation of health and safety programs at each of the planned projects in the area would prevent worker exposure to hazardous substances above permissible exposure limits.

The majority of the soils to be excavated for each of the build alternatives of the project would be from the Embarcadero Roadway alignment. These soils have been reclassified as nonhazardous by the California Department of Toxic Substances Control and may be used as daily cover material at a nonhazardous waste landfill. Landfills often have daily cover deficits and must import soils for this purpose. Therefore, the soil excavated as part of the project could fill an existing need at nearby landfills and eliminate the project-specific and cumulative adverse effect associated with using landfill capacity. Those soils that have not been classified as non-hazardous would be characterized through sampling and analysis prior to off-hauling and disposal to determine proper handling procedures and selection of a permitted disposal facility."

(USEPA) Water Resources

National Pollution Discharge Elimination System: Each of the proposed build alternatives would result in net decreases of untreated urban runoff that reaches the Bay. As discussed on page 478 of the EIS/EIR, under existing conditions, runoff from the eastern portion of the Embarcadero Roadway drains directly to the Bay without treatment. The proposed project would divert that runoff, along with the runoff from the rest of the project site, to the City's combined (stormwater and sanitary) sewer system. This runoff would then be treated at the Southeast Water Pollution Control Plant. Therefore, the project would provide a net benefit to water quality in the Bay. Details regarding the existing sewer conveyance system components are included in the Hydrology and Water Quality Effects Report. A copy of this report is available for review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

A Reference to the EPA/NOAA document is inserted on pages 479 and 480 of the EIS/EIR: "A jointly prepared 1993 EPA/National Oceanic and Atmospheric Administration (NOAA) guidance document, entitled Guidance for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters, would be referenced during preparation of the project-specific SWPPP. The recommendations contained in the 1993 EPA/NOAA document for minimizing nonpoint source pollution both during and after construction would be applied to the project, as appropriate, and may include:

Erosion Control Practices

- Schedule the project so that clearing and grading are done during the time of minimum erosion potential (late spring through early fall).
- Stage Construction. Avoid areawide clearance of construction sites. Plan and stage land disturbances so that only the area currently under construction is exposed.
- Cover and stabilize soil stockpiles.
- Use wind erosion controls.

Sediment Control Practices

- Use sediment basins or traps to collect sediment-laden runoff from the construction site.
- Install filter fabric fences in areas where sheet flow carrying sediment is likely to occur.
- Protect sanitary/storm drain inlets from sediment-laden runoff using filter fabric, straw bails, gravel, and/or sand bags.
- Use construction entrance and exit pads designed to collect sediment from equipment and vehicle wheels to prevent off-site transport of sediment.

Permit Requirements: The requirements of the General Permit for Discharges of Storm Water Associated with Construction Activity are discussed on page 478 of the EIS/EIR. The text has been modified to include the requirement to file a Notice of Intent to comply with the General Permit, as follows: (Inserted on page 478) ...with Construction Activity. "The contractor or project sponsor would be required to file a Notice of Intent to comply with the provisions of the General Permit with the State Water Resources Control Board." The terms for coverage...

(USEPA) Hazardous Waste

The EIS/EIR describes the hazardous substances that have been identified in the subsurface in the project area. In portions of the project area (along The Embarcadero), the soils to be excavated have been characterized as containing lead levels exceeding California hazardous waste criteria (but not Federal threshold levels for the definition of hazardous waste). As discussed in the EIR/EIR, page 486, the soils along The Embarcadero have been reclassified as non-hazardous by the State of California; these non-hazardous soils would be managed as non-hazardous waste and would not require EPA Generator numbers or have to be hauled off-site by a licensed hauler; however, the soils would have to be managed in accordance with a Site Mitigation Plan, as described on page 498 in the EIS/EIR. An SMP has been prepared for this project, and has been approved by the San Francisco Department of Public Health. Among other requirements, the SMP requires that the contractor handle all hazardous waste in accordance with applicable Federal and State regulations. To clarify the requirements of the SMP, the text on page 498 has been modified as follows:

- Description of Environmental Conditions. An SMP must include a description of the types and concentrations of contaminant that may be encountered during the construction activity;

- Preparation of a Health and Safety Plan. If appropriate, an SMP requires the preparation of a site-specific Health and Safety Plan which would require monitoring of environmental site conditions, specify engineering controls to minimize the potential for worker exposure to contaminants (including specific types of personal protective equipment to be used under various conditions), and specify measures to protect the public from exposure to contaminants. The Health and Safety Plan would have to satisfy OSHA requirements for protection of site workers;

- Management of Excavated Soils. An SMP must include specific criteria for evaluating and classifying soils as they are excavated, proper soil containment procedures, and expected treatment and/or disposal options.

Soils to be excavated outside of the area where the soils have been reclassified would need to be characterized prior to off-site disposal to determine appropriate disposal facilities. To disclose that the project sponsor could become a hazardous waste generator should excavated soils, outside the area of reclassification, become characterized as hazardous (either California or Federal), the following text has been inserted on page 499 of the EIS/EIR.

"All soils, whether hazardous or reclassified as nonhazardous (as discussed on page 486) would be managed during excavation and handling to protect the health and safety of workers and the public, as required by the SMP as well as 29 CFR 1910.120. Disposal options for nonhazardous soils may differ from disposal options for hazardous soils. Any wastes that were land banned would be treated at the disposal facility prior to placement in the landfill, in accordance with the permit requirements pertaining to the operation of the facility. If soils outside the reclassification area are excavated and characterized as hazardous, the project sponsor would become a hazardous waste generator. Transportation and disposal of soils classified as a hazardous waste would require acquisition of an EPA Generator Identification number and hauling by a licensed hauler."

Excavated soils are not proposed to be treated on site; therefore, the EIS/EIR does not contain information on on-site treatment methods. The text on page 496 has been changed to clarify that no on-site treatment would occur. Any land-banned wastes generated for off-site disposal would be treated at the disposal facility prior to placement in that facility, as described on the amended page 499.

The EIS/EIR has been amended on page 498 to clarify that all construction workers would need to comply with OSHA requirements regarding site health and safety procedures.

The EIS/EIR has been amended on page 497 to describe that soil samples would be collected to characterize the soils outside of the reclassification area to determine soil handling and disposal procedures and options.

11.5.6 Historic Architectural Resources and Archaeology

A. Second Street Off-Ramp would Terminate at the Clocktower's Driveway (Clocktower, SOMA Rose, Baldwin, Burkhart)

The off-ramp proposed in the Second Street Option of Alternatives Three and Five, would touch down across Second Street from the Clocktower, an architecturally significant building. The building's significance derives from its association with the Schmit Lithography Company, and with other historic warehouse structures in the immediate vicinity. The significance of the warehouse district derives from its historical role as a warehouse/industrial area which served San Francisco's economic development for over a century. Traffic increases projected to occur as a result of the current project or as a result of background traffic growth, would not affect the associations or qualities which contribute to the building's significance or to the enjoyment of the warehouse district. (The Clocktower building and the district are appreciated today, even though a major elevated freeway is immediately next door to the building, and traffic volumes exceed levels that were common during the district's historical development.)

B. Table 3.11-1 and the SHPO's Letter (SFRA)

To be consistent with the findings of eligibility contained in Cherilyn Widell's letter of August 8, 1995, as well as subsequent determinations regarding National Register eligibility by the State Historic Preservation Officer (SHPO) and a current print-out of the SHPO's data base, the following changes have been incorporated into Table 3.11-1 in the EIS/EIR (pages 220-222):

- "20 California Street is shown as "E" (eligible for the National Register)
- 64 Clemintina Street is shown as "E"
- 17-21 Drumm Street is shown as "ME" (may become eligible)
- 23-29 Drumm Street is shown as "ME"
- 31-35 Drumm Street is shown as "ME"
- The Pier 1-5 Bulkheads are shown as "AE" (appears eligible)
- 144-46 the Embarcadero is shown as "AE"
- 166 The Embarcadero is shown as "E"
- 231 First Street is shown as "E"
- 246 First Street is shown as "E"
- 301 Folsom Street is included and shown as "AE", with a "B" Heritage rating
- 443 Folsom Street is shown as "E"
- 449 Folsom Street is shown as "AE"
- 224 Folsom Street is not eligible for the National Register
- 347 Fremont Street is shown as "E"
- 943 Harrison Street is not eligible for the National Register and is omitted from the list

- 101 Howard is shown as "AE"
- 527-29 Howard is shown as "AE"
- 531-33 Howard is shown as "AE"
- The Path of Gold Light Standards are shown as "E"
- 1 Market Street is shown as "AE"
- 400 Spear Street is shown as "AE"
- Footnote one has been expanded to include the following additional sentence: "Note that the SHPO has determined that the South End Historic District appears eligible for the National Register."
- Footnote four has been changed to read: "There are four categories used in the National Register column: Listed, Eligible for listing, Appears Eligible for listing, and May become Eligible for listing."
- The following buildings/structures have been added to those that are shown as "Listed" in the California Register: 20 California Street, 64 Clemintina Street, 166 The Embarcadero, 231 First Street, 246 First Street, 540 First Street, 443 Folsom Street, 347 Fremont Street, 2 Harrison Street, and the San Francisco-Oakland Bay Bridge."

The last sentence of Section 4.15 on page 500 is modified to state that "The State Historic Preservation Officer concurred with the findings of effect contained within a Historic Properties Survey Report and Evaluation of Effects prepared for the proposed project, which concluded that none of the project alternatives would adversely affect historic architectural resources and that additional steps must be taken to ensure no adverse effect on archaeological resources."

The first sentence of the second paragraph on page 500 has been modified to state that "Section 3.11.1 identifies all historic architectural resources located within the project's APE, including seven properties that are listed in the National Register, ten properties determined eligible for the National Register, nine properties and a portion of one historic district that appear eligible for the National Register, and three properties that may become eligible for the National Register if additional research or restoration work is performed."

The term "Memorandum of Understanding" (MOU) on page 506 has been changed to "Memorandum of Agreement" (MOA). A signed copy of the Final MOA *is* included in the Final EIS/EIR.

There appears to be some confusion about the National Register status of 240-42 Steuart Street. The SHPO's current data base shows the Seaman's Institute Building at 240-42 "Stewart" Street as appearing eligible for the National Register. The opposite determination was made previously by the SHPO and the Keeper of the Register. To resolve this confusion, the SHPO has requested that Caltrans undertake an evaluation of the building prior to transferring ownership of the property to the City. The commenter should contact the SHPO and/or Caltrans to determine the results of this evaluation.[16]

Comments regarding the Draft 4(f) Evaluation are responded to in Response 11.5.10, below.

11.5.7 "Environmental Justice" (USEPA, Hestor, Chinatown TRIP)

As stated on page 401 of the EIS/EIR, the executive order regarding "environmental justice" requires that federal agencies consider the potential of "disproportionately high" adverse effects on minority and low income populations. For a transportation project, "disproportionately high" adverse effects would most often occur if a roadway, railroad, or other project feature physically bisected a minority or low income neighborhood, leaving other neighborhoods intact. The current project would not bisect a minority or low income neighborhood.

Transportation projects can also have "disproportionately high" adverse effects if they physically avoid minority or low income neighborhoods, denying these areas accessibility that is provided to other neighborhoods. As explained in responses above, and on pages 154-168 and 386-393 of the EIS/EIR, traffic conditions in downtown San Francisco, and adjacent neighborhoods such as Chinatown did change as a result of the 1989 earthquake. Effects of the earthquake should not be confused with effects of the current project, however, which proposes improvements to local streets and ramp connections to the regional freeway system. In other words, although the earthquake did change travel patterns, increasing congestion on some north-south corridors and increasing travel time to/from Chinatown, the current project would not further aggravate these changes, and is intended to improve traffic flow and accessibility to the extent feasible by building a system of ramps and City streets, instead of rebuilding the elevated Embarcadero Freeway and TSS.

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[16] Cherilyn Wydell, State Historic Preservation Officer, November 27, 1995 Letter to Thomas G Conrad of the San Francisco Redevelopment Agency. A copy of this letter is available for review in the project case file at the San Francisco Planning Department.

In order to further ensure that there would be no disproportionately high adverse effects from the proposed project on the Chinatown area, City officials have held approximately 10 small group working sessions and three publicly noticed meetings with the Chinatown community between October 1995 and March 1996. A separate transportation study of the Chinatown area was conducted, and a variety of transportation programs and measures are proposed for the area, some as a part of this project, and some which would be implemented independently. See pages 386-396 and 527-530 of the EIS/EIR for a complete discussion of the effects of the proposed project on the Chinatown area, and the measures taken and proposed by the City to ensure that no disproportionately high effects adverse would be felt in that area.

11.5.8 Pollution Prevention (USEPA)

To ensure compliance with Public Law 010-508, Pollution Prevention Act of 1990 (PPA), the project would include implementation of a Stormwater Pollution Prevention Plan (as discussed on page 478 of the EIS/EIR), a Health and Safety Plan (as discussed on pages 480 and 499), and hazardous materials procedures (as discussed on pages 498, 499 and 500). Sewer discharge requirement would be met, and mitigation measures would be implemented to minimize dusts and air emissions (page 453). The City will also develop a Mitigation Monitoring Program to ensure that the mitigations proposed to meet the PPA requirements are implemented as part of the project.

11.5.9 Responses to General Comments on Cumulative Environmental Effects, including comments on Cumulative Construction Period Effects (USEPA, JPB, SFRA, Goodenough)

A. Cumulative Construction Effects (JPB)

As stated above in Response 11.5.4C Construction Period Noise Effects, construction impacts are by definition temporary, and they are generally experienced differently at various locations and at various times during any construction process. Construction of the current project is expected to take between 20 and 21 months, and would generate the most intensive activity along the Embarcadero, between Folsom Street and Broadway, and at the locations where ramp modifications are proposed. For example, the Preferred Alternative would involve modifications to the existing Fremont Street off-ramp from I-80 westbound, and to the existing Fourth Street off-ramp from I-80 eastbound; these locations would experience the greatest activity during construction.

Although a final construction staging plan has not been developed, construction of the current project is expected to be complete by the year 2000, and would be unlikely to coincide with construction of the CalTrain extension in terms of both timing and location. Non-specific and unsupported suggestions regarding "serious cumulative construction impacts" are therefore unfounded. Nonetheless, the following sentence has been added to the mitigation measure at the bottom of page 367: "The City would also contact other transit operators, including CalTrain, to ensure that there is coordination regarding construction of planned transit improvements in the vicinity."

B. General Comments Regarding Cumulative Effects (Goodenough, USEPA)

Both NEPA and CEQA require that potential effects of a proposed project be considered in the context of other past, present, and reasonably foreseeable future projects, and that cumulative effects of these projects be considered. Specifically, CEQA Guidelines Section 15335 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

Neither NEPA or CEQA require that potential cumulative effects be addressed in one stand-alone section of an EIS/EIR, and the City routinely discusses cumulative effects under relevant environmental topic headings within EIRs, and only then, when the cumulative effects are potentially significant. In conformance with CEQA Guidelines Section 15130, the discussion of cumulative effects under relevant topic headings "reflects the severity of the impacts and their likelihood of occurrence."

As described above in Response 11.5.3C, Cumulative Air Quality, and Response 11.5.4D, Cumulative Noise Effects, the transportation, air quality, and noise sections of the EIS/EIR are based on future travel projections which incorporate estimates of future population and employment growth, and therefore present the potential effects of past, existing, and reasonably foreseeable future development. Related transportation projects, such as the F-Line and the MUNI Metro Turnaround, are also considered in the analysis. In this way, cumulative transportation, air quality, and noise effects are addressed by the EIS/EIR and described as part of the 2015 analysis results. Possible future projects such as development on Caltrans-owned parcels are considered too speculative to be specifically called-out in the analysis, particularly since some parcels would have to be rezoned prior to use for private development. (Rezoning, if proposed, would take some time, and would require additional environmental analysis under CEQA.) Nonetheless, potential development on these sites, and on North of Market parcels formerly owned by Caltrans and now under City jurisdiction, has been incorporated into cumulative travel projections for 2015 by distributing projected employment growth, as described on pages 265-267 of the EIS/EIR.

The underground parking structure on Assessor's Block 202, which may be constructed in order to compensate the Port for property needed by the project, would be part of the project if constructed, and would not be a related or reasonably foreseeable future project for which cumulative impacts would have to be considered. As stated on page 415 of the EIS/EIR, the traffic (and therefore noise and air quality) and pedestrian analyses presented in the EIS/EIR consider potential future increases in traffic and pedestrian volumes generated by the proposed garage. Manual traffic assignments assumed in excess of 340 spaces on Block 202. Also, analyses of hazardous materials, hydrology, and archaeology considered the proposed garage, and mitigation measures related to hazardous materials and to archaeology would apply to any excavation and construction activities associated with the garage, if approved and built.

Specific comments regarding potential cumulative effects related to hazardous materials (and dust generation), excavation, erosion, and runoff are addressed in Response 11.5.5: Responses to Comments Regarding Hazardous Materials and Hydrology.

Analysis of potential cumulative land use impacts is contained in the EIS/EIR at pages 245 through 251. The discussion on these pages analyzes projected employment forecasts and development within the study area for the year 2015. The analysis includes all reasonably foreseeable projects in the study area (as required under 40 CFR 1508.7) including development projected under the San Francisco Downtown Plan for the C-3 Districts as well as development projected for the Mission Bay area. With regard to cumulative employment impacts, the Association of Bay Area Governments (ABAG) employment projections for San Francisco were used as a starting point for forecasts. The horizon year for the EIS/EIR analysis is the year 2015, five years beyond the horizon year for ABAG's projections. Therefore, it was necessary to extend the ABAG projections further into the future. This was done by preparing a more detailed forecast based on an analysis of regional influences on employment growth, in conjunction with an analysis of the trends in the ABAG projections for the Bay Area and San Francisco.

The EIS/EIR presents the project's potential visual and cultural effects on the "future context" in the project area. Therefore the visual and cultural effects discussed in the EIS/EIR represent potential cumulative effects. Non-specific and unsupported statements regarding potential cumulative visual and cultural effects are speculative in nature and require no response.

11.5.10 Responses to Comments Related to Section 4(f) and Section 106(USDOI, MALETIC)

(USDOI) Cooperation and coordination with federal and local authorities have been sought in the pursuit of an agreement on mitigation measures that will minimize harm to park and recreational resources. At the federal level, the Department of Interior (DOI) and the Department of Housing and Urban Development (HUD) were consulted, and their input sought regarding lands within the 4(f) study area under their respective jurisdiction. At the local level, the San Francisco Recreation and Park Department, the Port of San Francisco, and the San Francisco Redevelopment Agency were consulted during the preparation of the 4(f) evaluation regarding the status and current design of potential 4(f) resources within their respective jurisdiction, as well as future park and recreational resources planned within their jurisdiction. The potential 4(f) effects of the project, together with the letters of concurrence supporting the proposed project, is documented in the Final Section 4(f) Evaluation contained in the Final EIS/EIR for the proposed project. (See p.65 of the Final Section 4(f) Evaluation.)

Similarly, the State Historic Preservation Official (SHPO) was consulted during the preparation of the Historical Properties Survey Report (HPSR) and Evaluation of Effects for the project, and in the development of a Memorandum of Agreement (MOA). SHPO's concurrence letter on the HPSR and a signed copy of the MOA are included in the Final EIS/EIR (pp. 570-571 and Appendix E).

(MALETIC) The intent of 4(f), in part, is to protect publicly owned park and recreational resources from unnecessary use. It does not rule out use of 4(f) resources for transportation use if it can be proven that there is no feasible and prudent alternative and every effort is made to minimize harm. The current planning/design effort for the Preferred Alternative follows that approach.

11.6 Responses to Comments on Businesses and Economic Issues

11.6.1 Farmers Market (Port, Means)

(Port) At the request of Port staff, Pier 1/2, the small parking lot and public access area between the Ferry Building and Pier 1, has been added to the list of possible locations for the Saturday Farmer's Market on pages 21 and 403 of the EIS/EIR.

(Means) The EIS/EIR appropriately describes displacement of the Saturday Farmer's Market as one effect of the project (pages 21 and 403). While there is no guarantee that the Farmer's Market would be relocated from the roadway median following its displacement, the Port's comments are evidence of efforts to find an alternative site for the Market and to retain the use on Port property.

11.6.2 Port Parking Displacement and Compensation (Port, SFTA, Sierra Club, SFT, Walters, Rolfe, Means)

The information provided in the EIS/EIR regarding the amount of revenue loss was a recitation of financial information which was provided by Port Staff. The information in the EIS/EIR did not attempt to project future revenue from the "lost" parking spaces, but rather stated that historical revenues which the Port had received from parking spaces within the Port's jurisdiction in 1992-93 totaled approximately $1,415,000. The amount represented over 10% of the Port's annual operating income during that period. Past revenues from parking spaces would be one of many factors used to ultimately estimate the value of the Port property.

The EIS/EIR indicated that compensation for the Port for the property that would be taken for roadway purposes could occur through either of two ways: monetary compensation for the value of the property taken, or functional replacement of the parking spaces. Construction of a parking garage as functional replacement for the lost parking spaces would require concurrence from Caltrans and approval from the Federal Highway Administration. The value of the property which would be taken had not been estimated as of the time of publication of the Draft EIR/EIR. However, subsequent to publication of the Draft EIS/EIR, the City of San Francisco Real Estate Department has estimated the fair market value of that property to be in the range of $6,000,000 to $10,000,000. It should be noted that the various city, state and federal agencies involved in this project have not reached an agreement on the final appraised value of this property. It is presumed that a subsequent appraisal would be performed to establish a then current market value at the time that a decision is made regarding how to compensate the Port.

The EIS/EIR did not try to present a rationale for the replacement parking spaces, or for the direct monetary compensation for the value of the property. As stated in the Approval Requirements and San Francisco Master Plan Policies Section of the EIS/EIR (Section 2.4), in order to approve the project, the San Francisco City Planning Commission would ultimately need to make a finding that the Preferred Alternative, and any mitigation measures included in the project, is consistent with the San Francisco Master Plan. The findings regarding Master Plan consistency would necessarily involve a balancing of many different, and sometimes competing policies and objectives, including, but not limited to, policies from the following Master Plan Elements: Transportation, Recreation and Open Space, Urban Design, and Commerce and Industry.

As indicated by the commenter, and as stated in the EIS/EIR, one of the City's Transportation policies is to "maintain public transit as the primary mode of transportation". The parking garage, if built, would provide replacement parking only for spaces lost by the Port due to the project. The parking rate structure would also favor short-term parking, as per Master Plan policy, so as not to encourage commuting by automobile. In addition the EIS/EIR, and a Socioeconomic background report prepared for the EIS/EIR, discuss the loss of revenue to the Port from the loss of parking, as well as the type of parking spaces lost and needed by the Port, the types of business that use and/or need the parking, the supply of parking within a comparable distance from the Ferry Building, the Port's plans for renovating the Ferry Building, and the potential economic effects to the Port from the loss of parking. Ultimately, all of those factors, and perhaps others, as well, would need to be considered by the City Planning Commission when making a determination as to Master Plan consistency.

(Port) As explained on page 409 of the EIS/EIR, the displacement of Port parking along The Embarcadero would not constitute a substantial environmental impact given the present and future parking supply within walking distance to The Embarcadero. Therefore, no environmental impact mitigation measures are proposed, including the provision of interim parking during construction of the project and, if approved to build, before completion of the proposed replacement parking garage. However, any temporary and/or permanent loss of Port property due to the project will be considered in determining the appropriate compensation to the Port for their economic impacts on the Port.

11.6.3 Chinatown Businesses (Hestor, Chinatown TRIP, Chung)

A. Changes in Traffic Conditions have Meant Changes in Economic and Business Conditions Since the Earthquake (Hestor, Chung)

As explained in responses to comments on the scope of the transportation analysis (See 11.4.1 above), a supplemental analysis of traffic conditions in Chinatown was undertaken, with substantial public participation. Additional text and diagrams have been added to the EIS/EIR to further explain the changes that have occurred (pages 386-393).

The supplemental analysis confirmed that travel patterns changed as a result of the earthquake, and that traffic volumes increased on some corridors, and decreased on others. In general, east-west movements declined (along Broadway, Clay, and Washington Streets, for example), and north-south movements increased (along Sansome and Battery Streets). Stockton Street, which was extremely congested prior to the earthquake, has remained so, and the limited data available does not show a substantial increase in volumes (probably because Stockton Street was already at or near capacity in 1989). As stated in a related response, above, this is not to say that volumes at certain intersections along Stockton have not increased, and the commenter's analysis of the Stockton/Clay and Stockton/Sacramento, while based on the same limited data as the Jack Fleck memo referred to, describes a 9% increase in AM Peak southbound traffic at one intersection, and a 26% increase in southbound traffic at the other. (It is unclear whether this is evidence of a "substantial increase" in southbound traffic between the two streets, since turns from Sacramento westbound to Stockton southbound also increased.) A copy of this analysis and comment is reproduced earlier in this volume.

In large part, congestion along Stockton Street is due to the Street's very nature as a neighborhood shopping district, with all its associated characteristics: truck loading, high pedestrian volumes at crosswalks, and occasional double parking. The supplemental Chinatown analysis identified parking and traffic enforcement as the best way to address congestion levels on Stockton Street between Broadway and Market Streets. The Department of Parking and Traffic has agreed to implement this and other recommendations of the supplemental Chinatown analysis as soon as possible.

Accessibility between the regional freeway system and Chinatown clearly changed as a result of the earthquake, and it may be that some drivers and delivery companies now find that routes to their destinations are more complicated and take more time. All areas of Chinatown remain accessible, however, and only an uninformed driver would conclude that they could not get to Chinatown at all anymore, simply because the Embarcadero Freeway ramp at Washington Street no longer exists. This is not to deny that some delivery companies may "redline" as suggested by the commenter, and avoid certain areas of the City.(Chung) In the Chinatown area, it is likely that the narrow width of streets and existing traffic congestion contribute to a delivery company's decision with regards to service areas, in addition to accessibility to and from the freeway. The current project would improve accessibility somewhat by modifying existing freeway ramps, realigning the Mid-Embarcadero, and implementing a package of operational and surface street changes. The project would not rebuild an elevated freeway, however, and would not substantially widen streets or completely eliminate traffic congestion.

B. The Number of Chinese Business has Declined (Chinatown TRIP)

As explained on page 193 and 401 of the EIS/EIR, some people blame the change in freeway access caused by the earthquake for an economic downturn in Chinatown and other neighborhoods in the northeast quadrant of the City. Others, with equal conviction blame the economic recession which hit California at about the same time as the earthquake for any loss in business. The conflicting opinions illustrate the difficulty in determining causality of economic shifts, however small or great.

11.6.4 General Comments on Business and Economic Issues (Letunic, Queen, SOMA Rose, Paglietti, Caramia)

(SOMA Rose, Caramia) If approved, the off-ramp proposed in the Second Street Option of Alternatives Three and Five would take about 15 months to construct. The on-ramp proposed in Alternatives Three and Five would take about 21 months to construct. As described on pages 319-320 of the EIS/EIR, temporary lane reductions on surface streets might be required during construction, but would be limited to off-peak periods. Pedestrian and vehicle access to all residences and businesses in the vicinity would be maintained. Traffic congestion could increase due to reductions in lane width and construction truck-traffic, noise levels could rise, and construction activities could generate dust. These potential environmental effects are described on pages 321, 426, and 450-441 respectively. Mitigation measures regarding construction period noise and dust generation have been incorporated into the project. While certainly an inconvenience to area residents, employees, and visitors, there is no evidence that potential temporary increases in congestion, noise, and dust, would "kill" any specific business.

(Letunic) As stated on pages 45-46 of the EIS/EIR, accessibility contributes to the economic viability of existing businesses and contributes to the creation of new businesses. The loss of the Embarcadero Freeway and the TSS following the 1989 earthquake has resulted in congestion on certain downtown streets and has contributed to a perception that important activity centers such as Chinatown, North Beach, Fisherman's Wharf, and the Financial District, are less accessible than before the earthquake. For these reasons, the proposed project, which would marginally increase the capacity of freeway ramps while realigning and improving the operation of the Embarcadero and other local streets, and which would facilitate planned transit improvements such as the MUNI F-Line and the MUNI Metro Extension/F-Line connector, could change peoples perceptions about access. (See page 401.) The commenter is correct, that the statement quoted should read "Enhancement of ~~automobile~~ access *and increased perceptions of accessibility* would benefit the long-term economic productivity of Downtown San Francisco and adjacent neighborhoods." (p.512) Travel assumptions in the EIS/EIR are based on the MTC travel model described on EIS/EIR page 265, and in responses to related comments. Assumptions appropriate to urban areas such as San Francisco are inherent in the MTC model. (Letunic)

(Queen) As stated on pages 48-49 of the EIS/EIR, planning for alternatives to replace the elevated Embarcadero Freeway began long before the structure's actual demolition and removal in 1991 because of damage suffered in the 1989 earthquake. Beginning in the 1970's, local land use plans called for removal of the Freeway, and the matter was even voted upon by the electorate in the late 1980's. The earthquake provided the City an opportunity to achieve a long-term goal, and thus the current project has been defined as "Alternatives to (full in-kind) Replacement of the Embarcadero Freeway and the TSS." None of the alternatives would "take" private property, either by using that property for transportation improvements, or by unreasonably restricting access to or use of that property. Also, there is not evidence that project alternatives would "kill the Port," "kill the Transbay

Terminal," convert the City to a "single type of economy," or "kill the northeast quadrant to support the Mission Bay project."

11.7 Responses to Comments Regarding General Organization of the Document, Graphics, Factual Information Provided, and the Review Process

A number of comments received discussed the general organization of the document, criticizing its table of contents, and suggesting ways that the contents could be expanded, while the entire document could be shortened. Responses to these comments follow, along with a description of resulting changes to the text of the EIS/EIR. Comments regarding figures or graphics, and regarding factual statements contained in the Draft EIS/EIR are also responded to below.

11.7.1 General Approach/Organization of the Document (SFRA, SPUR, Hestor, Maletic, Alexander, Chappell)

A. General Organization/Table of Contents (Hestor, SFRA)

In response to these comments, the text of the EIS/EIR has been amended to include more numbered subheadings in the transportation section (pages 265 to 396), and both the index and the table of contents have been expanded. Also, the distribution list has been abbreviated to include only public agencies and persons who commented on the Draft EIS/EIR. Headers are intended to inform the reader of the larger context of material on any given page, and have not been modified to include individual topic headings.

B. Repetition in the Alternatives Description (SFRA)

Surface Street and Operational Improvements common to all build alternatives are repeated in the description of each alternative so that readers who are seeking a description of a specific alternative may get that description by looking in one place. Cross referencing a list of common features would save paper, but would be less efficient for some readers, and was therefore rejected by the authors.

C. "Bundling" of Project Features (Spur, Maletic, Alexander, Chappell)

"Unbundling" the alternatives into a list of components such as road changes, freeway ramps, etc. would be an effective way to solicit public opinion regarding individual features of each alternative, and it would be possible to generally describe the environmental effects of most components individually. Separating the Mid-Embarcadero portion of the project from the Terminal Separator portion of the project would also encourage public comments to be more specific about the variables inherent in each portion. For that reason, the City staff has prepared a detailed summary description of each portion, referred to as the Mid-Embarcadero Project and the Terminal Separator Structure Project, for Master Plan Referral purposes. These summary descriptions are included in Appendix G of the EIS/EIR.

In terms of a detailed environmental analysis however, each project component would have slightly different effects (on freeway and local traffic congestion, for example) depending on the assumptions made regarding other changes to the transportation network. Time and funding constraints prohibited studying each component with countless combinations of other components, and it was necessary to analyze given "bundles" or combinations of components (i.e. "Alternatives").

This necessity in terms of conducting the environmental analysis, should not constrain members of the public from voicing opinions regarding specific components of one or more alternatives. In fact, many commenters did just that, voicing support or opposition to specific ramps and roadway features. Project decision-makers also separated, to some extent, project components, in selecting a Preferred Alternative which can be described as the Fourth Street Option of Alternative Five, *without the Second Street on-ramp*.

D. Mitigation Monitoring Program (SFRA)

CEQA Guidelines Section 15126(c) states that EIRs should "describe mitigation measures which could minimize significant adverse impacts . . . [and]distinguish between the measures which are proposed by project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce adverse impacts . . . " All mitigation measures described in the EIS/EIR are proposed to be included in the project, and thus would be implemented by the City, Caltrans, or their agents (i.e. their contractors). In compliance with standard Caltrans/FHWA procedures and NEPA, not all measures included in the project are intended to mitigate potentially significant impacts, and some are intended as improvement measures to minimize non-significant impacts of the project. All are expected to be effective in eliminating or reducing associated impacts.

CEQA Section 21081.6 requires that public agencies adopt a mitigation monitoring program to ensure compliance during project implementation. CEQA specifically does not require that the monitoring program be included in the Draft or Final EIR, and states that the program shall be adopted when the public agency makes findings regarding project approval. Thus, a mitigation monitoring program for the current project will be prepared and forwarded to project decision-makers at the time they are asked to consider approval of the project. Consistent with City practice, the mitigation monitoring program will identify all measures included in the project, will assign specific responsibility for their implementation, will include reporting requirements if needed, and will indicate when such measures would be considered complete.

E. Baseline Conditions (SFRA)

For some issues, such as Transportation, an analysis of potential environment effects relative to pre-earthquake conditions was necessary in order to evaluate how the proposed Alternatives would function, relative to the Embarcadero Freeway. This was necessary for a determination as to whether the proposed Alternatives provided comparable capacity relative to the Embarcadero Freeway.

For other issues, such as Noise, the potential effects of the proposed Alternatives relative to current noise levels was more useful information, although a comparison with pre-earthquake noise levels provided a complete picture. In general, because one baseline (either pre-earthquake or current conditions) did not adequately serve to demonstrate all pertinent information regarding the potential effects of the proposed Alternatives, it was decided to present project impacts relative to both baselines.

11.7.2 Graphics (MUNI, SFRA, Levin, Chester, Hestor)

(SFRA) In response to these comments, Figure 3.3-1 (page 147), Figure 3.3-2 (page 151), Figure 3.4-1 (page 190) have been modified to eliminate piers along the waterfront which no longer exist.

Figure 3.3-4 (page 170) and Figure 3.3-6 (page 177) were provided by the transit operators whose service is depicted, and have not been modified.

Figure 3.5-1 (page 198) has been modified to be consistent with Figure 3.1-4 (page 133).

(Hestor) The direction of traffic flow on one way corridors has been added to the diagrams of project alternatives provided in Figures 2-2, 2-3, 2-4, 2-5, 2-6, and 2-7.

Traffic flow diagrams, illustrating major traffic patterns before and since the 1989 earthquake have been added as referenced on page 156, 157, 390 and 391. Clay, Washington, Sacramento, Stockton, and Broadway are all within the primary or secondary study areas, and therefore do not need to be "put back in" to the illustrations. Complete routes to and from the freeway system are shown, and additional routes to the west of the study areas are acknowledged.

Figures 2-2C and 2-2D (pages 69 and 71) attempt to communicate a lot of information about the number of lanes and their designation for automobiles or transit along two critical blocks of Fremont and First Streets. While the small scale of these diagrams requires careful scrutiny (and good eyesight), it also allows the maximum amount of information to be provided on standard size pages, avoiding costly production of larger fold-out pages. Information in the diagrams is also described verbally in the text on pages 68 and 70. (Levin) Time and funding constraints limited the opportunity to add more photographs, drawings, or photomontages to show differences between the split roadway (in Alternative Five and the Preferred Alternative) and the paired roadway (in all other Alternatives). The differences in terms of land use and pedestrian access are described on pages 238-239 and 377. Also, a commenter submitted graphic materials showing historical views and split-roadway proposals for the area in front of the Ferry Building. These materials may be found in Section 10.2 Comment Letters from Groups and Private Individuals.

The purpose of the photographs and photographic simulations is to provide a framework for discussion of past, existing and future conditions.

Since the treatment of the open spaces, recreational uses, public amenities, and other urban design improvements for the Mid-Embarcadero area is being determined separately from this study, the simulations illustrate the alternatives at the Preliminary Engineering stage only.

Specifics regarding the features and precise dimensions of the open space, recreational uses, public amenities, and other urban design improvements will be determined under the Mid-Embarcadero Urban Design and Open Space Study. Opportunities for public input and comment will be available during that study.

Figure 4.3-1, which includes photomontages of the Ferry Building area, has been modified to show consistent backgrounds.

(MUNI) Figures 2-1, 2-2, 2-3, 2-4, 2-5, 2-6, 2-7, 2-7A and 2-2B have been modified to include the loop track, which is described on page 107. Also, responding to a subsequent request from MUNI, Figures 2-2C and 2-2D have been modified to show the new location of streetcar tracks on Fremont and First Streets.

(Chester) The vehicles shown of Figures 2-1A and 2-2A are intended to help illustrate the cross-sectional lane configurations; they are not to scale. The LRVs on these figures have been changed to PCCs.

11.7.3 Corrections to Information Provided (SFRA, SFT, Levin, Chester, Gott, Rolfe)

In response to these comments, corrections to the text of the EIS/EIR have been incorporated. These corrections are listed below.

> (SFRA) As stated on page 445 of the EIS/EIR: Section 295 of the City Planning Code (Proposition K, the Shadow Ordinance) applies to public open spaces under the jurisdiction of the City's Recreation and Park Department. Pier 7 and Ferry Plaza are under Port jurisdiction, and are therefore not subject to this Code Section. South Park is subject to Section 295, and has been added to the list

of open spaces subject to City Planning Code Section 295 on page 455 in the EIS/EIR. South Park would be several streets removed and about 500-feet south of the Second Street off-ramp proposed in the Second Street Option of Alternatives Three and Five. The Second Street off-ramp would rise less than 12 meters (40 feet) above grade, and any new shadow from the ramp, which would be extremely limited due to the existing elevated freeway, would not reach South Park.

- The words "Consistent with" in the First sentence on page 424 have been changed to "Similar to."

- (SFT) The number of buses shown on Table 4.5-15 for Fremont Street is too low. MUNI schedules indicate that approximately 41 MUNI buses would pass through this street segment in the AM peak hour. The bus volumes shown on Table 4.5-15 are based on field counts. It is possible that on the day the counts were taken, bus circulation was impeded and a lower than normal count was observed. However, the number of buses shown on this table does not affect the analysis. This data was shown only to indicate the relative importance of each street segment in terms of bus circulation. Bus travel time data is presented on a per vehicle basis, and would not change if the number of buses changes.

- Page 399, last paragraph, second sentence is revised as follows: At this location, Second Street has two travel lanes in each direction, Stillman Street has one ~~eastbound~~ travel lane *in each direction*, and sidewalks and on-street parking are provided throughout the area.

- The street block lengths described on page 149 have been modified as follows: North of Market Street, the north-south blocks are 84 meters (275 feet) between property lines and the east-west blocks are either 84 meters (275 feet) or 126 meters (412.5 feet) between property lines. South of Market Street, the north-south blocks are 168 meters (550 feet) between property lines and the east-west blocks are either 84 metes (275 feet) or 251 meters (825 feet) between property lines.

The following items, suggested as a correction to the text of the EIS/EIR have not been incorporated for the reasons stated in each item:

- (SFRA) According to a facility map provided by staff of the San Francisco Recreation and Park Department, "Embarcadero Plaza" or "Ferry Park" are the appropriate names for parcels on Assessor's Block 3741 that are under the jurisdiction of the Recreation and Park Department. These parcels are located at the southern end of Justin Herman Plaza (i.e. south of Market Street), adjacent to MUNI's Ferry Bus Terminal. For this reason, and because Figures 3.5-1 (page 198) and Figure 4.7-2 (page 428) clearly show the locations of receptors referred to as "Embarcadero Plaza (South)", the name of this receptor location has not been changed to "Justin Herman Plaza", as suggested by the commenter.

- Harrison Street would be made a one-way westbound street only in Alternatives Three, Four, and Five. This street direction change was described in the detailed descriptions for these alternatives.

11.7.4 Review Process, Including Selection of Preferred Alternative, Comment Period, and Community Involvement (SFT, SPUR, CRC, Mah, Hestor, Levin, Lim, Rolfe, Haas, Friese, Maletic)

NEPA requires that the Final EIS/EIR prepared for any project identify the lead agencies' "preferred alternative." In many cases, agencies identify their preference in the Draft EIS/EIR, and carry that preference forward, or change it in the Final EIS/EIR. Because selection of the preferred alternative often precedes completion of the Draft EIS/EIR, and always precedes completion of the Final EIS/EIR, the selection cannot have the benefit of all analyses completed during the environmental review process, and is often based on a number of simple criteria, such as cost or ease of construction. It should be noted that NEPA does not require that project decision makers approve the preferred alternative identified in the Draft or Final EIS/EIR, and selection of a preferred alternative does not represent a commitment to approve the preferred alternative or any other project alternative.

The DPT Variant (now the Preferred Alternative) is described on pages 5-6 and pages 96-104 of the EIS/EIR. The Preferred Alternative was proposed as a compromise between Alternative Four and the Fourth Street Option of Alternatives Three and Five. Because impacts of the Preferred Alternative would fall between impacts of these two other alternatives, the impacts are represented by the other two alternatives. The City Planning Commission's recommendation that the Board of Supervisors select the Preferred Alternative did not commit the City to any course of action. Likewise, actions by other city commissions were not "rubber stamps" or inappropriate. However, based on public comments, a full analysis of the DPT Variant was undertaken and changes are reflected throughout the document. A full description of the process by which the preferred alternative was selected is included in Section 2.1.4, Selection of the Locally Preferred Alternative, beginning on page 56.

11.8 Responses to Preferences Expressed Regarding Alternatives (SFT, SPUR, Steuart, Clocktower, Meader, Rogers, Caramia, Baldwin, Lowe, Goodenough, Gott, Rolfe, Letunic, Bement, Poschmann, Bird, Haas, Pell, Chow, Kaliski, Koga)

Many groups and individuals expressed preferences for certain project alternatives, and opposition to other alternatives. Support or opposition to specific project features including specific ramps, extension of the MUNI 83 Bus Line, and construction of a parking garage under Assessor's Block 202, was also expressed. Comments which cite specific environmental or social concerns regarding the proposed alternatives or project features are responded to by topic in preceding sections. Statements expressing opinions that do not directly address potential effects of the project require no response. Likewise, unsupported statements regarding "negative effects" of project features also require no response where the analysis and information presented in the EIS/EIR lead to different conclusions.

The EIS/EIR does not present recommendations regarding proposed actions, but attempts to provide the public and decision makers with an objective analysis of project alternatives. Project decision makers will use the EIS/EIR in their deliberations regarding approval or disapproval of the project, and thus will have access to all comments including preferences expressed orally or in writing during the comment period on the Draft EIS/EIR. Commenters may also choose to restate their preferences during deliberations regarding project approval actions. The nature of the decision before decision-makers is precisely that articulated by one commenter: would the advantages of the project outweigh its potential detrimental effects? The EIS/EIR, including its analysis as well as public comments on the Draft document and responses to those comments, is intended to inform this decision.

12. STAFF INITIATED TEXT CHANGES

In addition to the text changes which have resulted from responses to comments, and referred to in the previous section (Section 11. Responses to Oral and Written Comments organized by Topic), the staff has initiated the following text changes to the EIS/EIR:

- To reflect the status of the EIS/EIR, the word "Draft" has been deleted or replaced by the word "Final" where appropriate throughout the EIS/EIR, and the front inside cover has been revised accordingly.

- The phrase "Section 4(f) Evaluation" has been added to the EIS/EIR title on the front cover and on the title page.

- "Land Use" has been added to the areas of potential adverse impacts and mitigation measures identified in the abstract of the title page.

- The "Preferred Alternative" has been incorporated into the EIS/EIR, with the following text changes:

  A new section (Section 2.1.4, Selection of the Locally Preferred Alternative) has been added, beginning on page 56.

  A detailed description of the Preferred Alternative, including a figure (Figure 2-7A), has been added as Section 2.2.6, beginning on page 96 and summarized on page 5.

  In Section 4, and where appropriate throughout the document, the impacts of the Preferred Alternative in each subject area have been discussed, either with new text specifically referring to the Preferred Alternative, or by inserting the phrase "Preferred Alternative" into the text where the impacts of the project alternatives are being compared.

  Also, the reference to "DPT Variant" has been replaced by the "Preferred Alternative" throughout the document, except where it was necessary to explain the origin of the Preferred Alternative (pages 5 and 56-58).

- To reflect a change in status of the MUNI F-Line/MUNI Metro Extension Connector project (from a "Possible future transit" project to a "related" project), the description of this project has been modified, and moved to page 108 under Section 2.3, Related Transportation and Urban Design Projects, as follows:

Resolution 95-158, passed by the San Francisco Public Utilities Commission on November 14, 1995, authorizes design of a F-Line/MUNI Metro Extension Track Connection and low-level boarding platforms along the MUNI Metro Extension, so that F-Line vehicles could use that corridor. The track connection would run along The Embarcadero from the vicinity of Mission Street south to the MUNI *Metro Extension* portal at Howard Street. *Because of the narrow Embarcadero median south of Mission Street,* tracks would be in traffic lanes *abutting the median.*

The track connection would allow F-Line vehicles to access the planned MUNI maintenance and storage facility south of Mission Bay via the MUNI Metro Extension tracks, but could be used for passenger service with changes to transit vehicles or station platforms. *City staff developed a proposed funding plan for this project, but have not yet secured that funding. The City's intent is to construct this track connection in conjunction with the Mid-Embarcadero project, provided funding can be secured. This project has previously been determined to be Categorically Exempt under CEQA and would not be using federal funds so it does not require NEPA review.*

As a result of the above, the text on page 111 under the heading "Possible Future Transit Extension" has been modified as follows:

> In addition to the related *transit improvement* projects described above, *another* transit improvement *is* possible in the area. *This involves extension of the California Cable Car to Market Street.*
>
> *Extension of* MUNI's California Street Cable Car line from its existing terminus at the foot of California Street to the Ferry Building area is not currently identified in the Municipal Railway Capital Improvements Plan and there is currently no funding for its planning or construction. For these reasons, the analyses presented in the EIS/EIR do not assume the *Cable Car* extension.

To clarify that the transit projects planned by MUNI for The Embarcadero roadway median are not part of the Mid-Embarcadero roadway project, the following new text has been added to page 2:

It should be noted that the planned MUNI projects for the Embarcadero surface roadway median are not required as a part of the Mid-Embarcadero and TSS replacement project (the proposed project), and therefore, could be implemented with or without the proposed project. However, under each of the build alternatives for the proposed project, described below, the roadway median has been reserved at MUNI's request to accommodate MUNI's planned expansion. While the City intends to construct the planned MUNI project concurrently with the proposed project, these MUNI projects are considered to be separate, but related projects to the proposed project for the purposes of this EIS/EIR. (See Section 2.3, page 104, for a description and discussion on the related transportation and urban design projects.)

Also, reference to the MUNI F-Line/MUNI Metro Extension Connector has been added to the alternative descriptions which appear on pages 66, 73, 81, 90; and on Figure 2-2B (page 65) and Figure 2-8 (page 105).

- To reflect that the proposed "Art Ribbon" for The Embarcadero is part of the build alternatives, a reference to the Art Ribbon has been added to the alternative descriptions which appear on pages 67, 76, 83, and 91.
- To clarify the Port's jurisdiction over the off-street parking spaces on the west side of The Embarcadero between Mission and Howard Streets, the following text change has been made on pages 67, 76, 83, and 91:

> A portion of the extra sidewalk area would be converted to off-street parking to be managed by the Port.

Similar reference has also been made on page 245.

- Reflecting current features included in the build alternatives, signalization of the Broadway intersections with Front and Davis Streets, and of the Bryant Street intersections with Main and Beale Streets, has been added to the alternative descriptions which appear on pages 70, 80, 86, and 95. Also, text has been changed to indicate that there would be two left turn lanes from northbound Embarcadero onto Washington Street.

- To clarify that Caltrans will design and construct the freeway and ramp improvements proposed in Alternatives Three, Four, and Five, and in the Preferred Alternative, the text on page 58 has been modified as follows:

> While the San Francisco Department of Public Works would be responsible for design, engineering, and construction of any changes to The Embarcadero roadway, Caltrans would be responsible for design, engineering, and construction of any changes to Caltrans facilities such as freeway on- and off-ramps.

Similar text changes also appear in the alternative descriptions on pages 76, 77, 78, 83, 91, and 92.

- To reflect that repairs of marginal wharf would be involved in any of the build alternatives, the following new text has been added to the alternative descriptions on pages 72, 80, 86, and 95:

> Construction of the expanded Herb Caen Way proposed in this alternative would require repairs of the existing marginal wharf between Pier 1 and Pier 5 and adjacent to pier 24. The repair work, which would occur beneath the piers, would be performed at low tide, and construction would not be performed during the winter season.

The potential impacts of this work have been addressed by the following text additions:

> Section 4.6.3, Business Displacement, page 403:

Regarding repair work that would be required under Piers One and Five, and adjacent to Pier 24, (see further discussion at p. 459, below) no business displacement would occur. This repair work would be similar to repair work which the Port routinely performs pursuant to an existing permit from BCDC. No business displacement has occurred in the past from the routine repair work under the piers, nor is any anticipated from this project.

Section 4.12, Hydrology and Water Quality, page 470: "The marginal wharf repair work necessary for the construction of the new promenade (Herb Caen Way) is covered by Port's permit for maintenance of Port facilities. This work will be performed at low tide, and will not affect the water quality of the Bay."

Section 4.10, Biological Resources, page 459: "Construction of the promenade (Herb Caen Way) under all build alternatives would require repairs of the existing marginal wharf between Pier 1 and Pier 5 and adjacent to Pier 24. This work will be performed at low tide and construction will not be performed during the winter season; this work would be identical to the work that the Port regularly performs under the piers, pursuant to an existing BCDC permit. No adverse environmental effects have resulted from that ongoing repair work, and similarly, none are anticipated here; waters of the United States or water quality will not be affected by the repair work."

- The estimated fair market value of Port property taken by the project and the estimated cost of constructing a replacement parking structure underground on Block 202 have been updated on pages 72, 80, 86, and 95, as follows:

The Port would realize a net loss of 339 parking spaces currently used for parking along the Embarcadero, which would be need for the proposed project. The estimated value of that property is $6+ million, although a future appraisal would be required to determine the exact value of that property. Compensation to the Port for the Port property needed for the project could be in the form of monetary compensation or replacement parking. One possible compensation option considered in this EIS/EIR is an underground parking garage on Assessor's Block 202. Other possible compensation options will be considered and a separate WEPA action may be required depending on the option selected.

Similar text changes also appear in the Summary section (pages 2, 3, 4, and 5), on page 415, and in Appendix A of the EIS/EIR.

- A new paragraph has been added on page 29A regarding the compensation to the Port for Port property taken by the project:

  The amount and type of compensation to be provided to the Port of San Francisco for the Port property (currently used for parking along the Embarcadero) needed for the proposed project is still under consideration. The Port would realize a net loss of 339 parking spaces from the proposed project. The estimated value of that property is $6+ million with an understanding that a future appraisal is needed to determine the exact amount. Compensation to the Port could be in the form of monetary compensation or replacement parking.

- The following new text has been inserted into the introductory section for "related" projects on page 104:

  but analysis of these related transportation and urban design projects has been included in the impact analysis in this document, at both the construction level, and future operational level, to the extent possible given the amount of detail known about those projects at this time. In some instances, conservative assumptions were made about these related projects in order to present a conservative cumulative impact analysis.

  The one major exception to this inclusion of the projects listed below, in the cumulative analysis, is the construction-related impacts from the SF-Oakland Bay Bridge Seismic Retrofit project.

  Sufficient details about this project were not know until too late in the EIS/EIR process to include any such analysis. It should be pointed out, however, that those impacts would have no bearing on the information provided in this EIS/EIR regarding future context and transportation effects, as impacts from the Seismic Retrofit project would occur for approximately four years, beginning in 1998. Hence, this EIS/EIR still allows decision-makers on this project to make a reasoned comparison between the alternatives analyzed in terms of how they would distribute traffic between the city streets and the freeway in the future analysis year of 2015.

Project approval requirements have been clarified on page 111 by the following text modifications:

> *Some of the decision makers listed below will need to consider the entirety of the proposed project, others may only need to consider the Mid-Embarcadero portions, or the Terminal Separator Structure portion. Appendix G consists of the Master Plan Referral Application for this project, which contains a description of which project components fall within the Mid-Embarcadero portion, and which fall within the TSS portion of the project.*

- Reference to the City's Master Plan has been changed to General Plan to reflect a recent name change, and the following has been added to page 120:

> *In addition to the General Plan policies cited, Department staff have identified some specific General Plan policies which would need to be revised or deleted in order to make the General Plan consistent with the proposed project. In general, these amendments would update specific provisions within the General Plan in order to reflect the demolition of the Embarcadero Freeway, and the City's desire to I) provide six traffic lanes, with pedestrian crossings and transit stops, along The Embarcadero; ii) create a grand civic plaza in front of the Ferry Building; and iii) create a major public park at Rincon Point at the base of Folsom Street.*
>
> *These General Plan policy amendments would be consistent with each of the build Alternatives described in this EIS/EIR. Hence, the potential environmental effects of these plan amendments are identical to those described for each of the build Alternatives. After certification of the Final EIR, the Planning Commission would hold a hearing and make a decision regarding these General Plan amendments, and the conformity of the proposed project with the General Plan.*

- To substantiate existing activities in the Ferry Building the following sentence has been inserted in the last paragraph on page 137:

> Various public and private uses are housed in the Ferry Building, including the Port of San Francisco offices, the World Trade Center, the world Trade Club restaurant, the Amtrak ticket office, and over 100 private offices and retail vendors.

- The following has been added to page 235 regarding the General Plan amendments:

Some General Plan amendments would be considered by the Planning Commission in conjunction with the proposed project. These amendments, as summarized above at page 120 are primarily updates to the General Plan which reflect the removal of the Embarcadero Freeway and more specific current design objectives regarding the relationship of the Embarcadero Roadway and open space opportunity sites in the project area.

- A reference to the background Transportation Technical report has been provided on pages 145 and 265.
- Additional information on existing and pre-earthquake traffic flow crossing Market Street has been provided in a new paragraph on page 155 and two new figures (Figure 3.3-3A and Figure 3.3-3B).
- The discussions on the land use impacts of the build alternatives have been expanded with the following text changes:

A new paragraph has been added on page 235, which reads:

With one exception, all project features proposed in the build alternatives would be located within transportation facility right-of-way. The new Embarcadero roadway would be located within the existing roadway right-of-way under the Port's jurisdiction or within the former Embarcadero Freeway right-of-way. The new ramps or modifications to the existing freeway and ramps would be located within Caltran's right-of-way or the former TSS right-of-way and the existing street right-of-way under the City's jurisdiction. The street and operational improvements proposed in the build alternatives would occur within the City's existing street right-of-way. If constructed, the proposed underground replacement parking structure would *be located beneath the southern portion of Block 202, which is within the right-of-way of the former Washington and Clay Street ramps to the Embarcadero Freeway.*

The paragraph following the above new paragraph (on page 236) has been modified to read as follows:

The one exception would occur under all build alternatives with respect to the use of Justin Herman Plaza, a Section 4(f) resource located opposite the Ferry Building. Alternative Five would use approximately 2024 *square meters (21,780 square feet)* of the eastern edge of Justin Herman Plaza. (See Figure 4.1-1.) Mitigation of this impact would require compressing the roadway median proposed in Alternative Five. *The Preferred Alternative would use 209 square meters (2,240 square feet) of the eastern edge of Justin Herman Plaza. Most of the area used by the Preferred Alternative (200 square meters [2,140 square feet]) is within the right-of-way under the Port jurisdiction; the remaining portion (9 square meters [100 square feet]) is under the jurisdiction of the San Francisco Recreation and Park Department.* (See Figure 4.1-5, p. 253 for an explanation and illustration of *the roadway configuration at Justin Herman Plaza in the Preferred Alternative). The alternative landscape and sidewalk design option being considered for the Preferred Alternative (see page 253A) would result in the use of approximately 390 square meters (42,260 square feet) of the eastern edge of Justin Herman Plaza; approximately 240 square meters (2,620 square feet) are under the Port jurisdiction and 150 square meters (1,640 square feet) are under the jurisdiction of the Recreation and Park Department.* This potential impact and mitigation are discussed further in the *attached Section 4(f) Evaluation. It should also be noted that the physical boundary of Justin Herman Plaza lies several feet east (or inside) of the Port jurisdiction line. The landscaped area at the eastern edge of Justin Herman Plaza is within the Port of San Francisco jurisdiction, and is commonly referred to as the "ragged edge". While within the Port right-of-way, the roadway configuration proposed under Alternatives Two, Three, and Four would require the use of about 200 square meters (2,140 square feet) of this "ragged edge" area, changing the existing landscaping use to sidewalk use. (See Section 4.1.2, Land Made Available, for amounts of new open space that would be created by the project.)*

Similar text changes have also been incorporated into the Summary section on page 7..

A new paragraph has been added on page 7, which reads:

Alternatives Two, Three and Four would provide approximately 1,012 square meters (10,890 square feet) of new open space for a potential plaza between the Embarcadero Roadway and the front of the Ferry Building. Alternative Five would provide about 4,452 square meters (47,903 square feet) of such space, in between the northbound and southbound lanes of the Embarcadero Roadway, in front of the Ferry Building. The Preferred Alternative would provide *about 3,510 square meters (37,830 square feet) of such space, in between the northbound and southbound lanes of the Embarcadero Roadway, in front of the Ferry Building. Each Build Alternative would also include a widening of Herb Caen Way, in front of the Ferry Building. Under the Preferred Alternative, about 2,910 square meters (31,340 square feet) of new Herb Caen Way space would be added in this area.*

A new mitigation measure has been introduced on pages 8 and 252 as follows:

To minimize the impact on Justin Herman Plaza that would occur under the Preferred Alternative, the City would redesign and reconstruct the transitional open space area between the roadway and Justin Herman Plaza. (See Figure 4.1-5 and Figure 4.1-5A). The transitional open space area will be designed within the context of the new roadway rather than a freeway, and will be more sensitive to pedestrian needs. Existing landscaping in this area will be replaced with new landscaping that is consistent with the proposed landscaping along The Embarcadero.

Similiar changes have also been made to the visual quality and urban design mitigation measures on pages 10 and 263.

Figure 4.1-5 on page 253 has been revised to show The Embarcadero roadway configuration at Justin Herman Plaza under the Preferred Alternative. *A new graphic (Figure 4.1-5A) has been added on page 253A to show an alternative landscape treatment and sidewalk location design option under the Preferred Alternative.*

- On Table 4.1-1 (page 242), the size of vacated property on Block 139 has been corrected to reflect the Port's estimate of its size (39,000 square feet instead of 3,046 square feet), and a footnote has been added which reads: "All of Block 139 and a major portion of Block 140 contain parcels owned by the Port of San Francisco. While freeway structures were removed from these parcels, there was no transfer of ownership from the State to the City."

- On Figure 4.1-4 (page 243) vacated sites on Blocks 3715 and 3742 have been shaded in, indicating that these parcels on the blocks bounded by the Embarcadero, Steuart, Mission, and Folsom Streets, no longer contain freeway structures.

- In the first full paragraph on page 244, the date February 9, 1995 has been changed to December 30, 1994, reflecting the correct date on which parcels on Blocks 140, 141, 165, 202, and 203 were transferred to City ownership. Block 139 has been deleted from this list of blocks, since it is and has been owned by the Port of San Francisco.
- The second sentence in the last paragraph on page 337 has been changed to read: "Three parcels along Broadway, and two between Clay and Washington Streets have already been transferred to City ownership."
- A reference has been inserted on page 260 to indicate that the promenade on the bayside of The Embarcadero roadway was dedicated on June 14, 1996 as "Herb Caen Way".
- Tree removal due to reopening of Davis Street between Washington and Clay Streets has been clarified with the following text modification on pages 262-263:

  Nine mature Lombardy poplar trees in the Davis Street right-of-way near Clay Street would be removed. These trees will be replaced with new trees in the landscaped area adjacent to the street and new street trees in the sidewalk.
- Information on "Possible Future Projects" (Section 4.5.1.9, pages 329-340) has been updated as follows:

  Under the "Transbay Terminal" heading, a new paragraph has been added at the end of this section (page 330) which reads:

  The San Francisco Board of Supervisors has recently expressed its preference for the relocation of the existing transbay terminal to the block bounded by Main, Beale, Folsom and Howard Streets, on a parcel that was opened up by removal of the Terminal Separator Structure. The existing transbay terminal site would then become available as a possible site for a new CalTrain station. Alternatives for constructing a new bus terminal and associated bus ramps on the existing site, or a new terminal at the Main/Beale site are expected to be analyzed in the CalTrain Environmental Impact Report. Work on that Draft Environmental Impact Report has just recently begun, as of the date of certification of this EIS/EIR.

  Under the "Rincon Hill Area" heading, the following sentence has been added to the first paragraph of this section:

The two alternatives to the arena project that will be considered in that environmental impact report are as follows: an alternative with 1,000 dwelling units, plus a small amount of supporting neighborhood commercial space; and an alternative 1,000 seat event center/theater, plus a multiplex movie theater, 500 dwellings and 300,000 square feet of retail space.

Within the same section, the following has been added to the last paragraph of that section (page 333):

All project-specific effects of the two alternatives to the arena will also be analyzed in the arena EIR. However, it is expected that the transportation effects of those alternatives, in particular as they relate to peak period traffic congestion and access to and from the freeway system, would be less than the potential peak effects of the proposed arena, which are generally discussed above.

Under the "Mission Bay Sports and Entertainment Complex/Waterfront Ballpark" heading, two new paragraphs have been added at the end of this section (page 335):

Subsequent to the publication of the Draft EIS/EIR for this project, the development agreement between the City and the property owner has terminated. Although no formal application has been made to the City, the property owner is now contemplating development of 2,000 dwelling units and 400,000 square feet of retail as a first phase development. Regarding potential transportation effects, the possible new development scenario would be well within the scope of the alternatives considered in the Mission Bay EIR, as well as the ABAG projections which were used as a basis for the transportation analysis for this project.

Additionally, on March 26, 1996, the voters of San Francisco passed Proposition B, which proposed construction of an approximately 42,000 seat baseball park on a site adjacent to China Basin Channel, south of King Street and east of Third Street. An Environmental Evaluation Application for that proposal was filed with the City Planning Department on April 3, 1996, and the City is beginning work on an environmental impact report. This proposed ballpark is on the same site, and at a comparable size to the ballpark which was described in the Mission Bay EIR, and generally described in the two pages above, in terms of its potential transportation effects within the study area for this project.

- Changes in Port parking supply under the build alternatives have been clarified by adding the following paragraphs at the top of page 368A:

  Due to the number of different Alternatives being considered, as well as the multitude of ways in which the parking numbers can be combined and presented (e.g., on-street/off -street; long term/short term; peak period/off-peak; Port jurisdiction/broader study area), and since one of the unresolved issues for this project is the issue of compensation to the Port of San Francisco for property taken by the proposed project, this section will first present a summary of the total net loss of parking space to the Port. This will combine all types of parking (e.g., on/off street; long/short term, etc.) within the Port jurisdiction area along the Embarcadero between Folsom Street and Broadway. Following that summary is a breakdown of parking gains and losses by some of the pertinent sub-categories.

  The total existing supply of parking spaces in the Port jurisdiction area from Folsom to Broadway is 558 spaces (423 off-street; 135 on-street). The net change in this supply, by Alternative, is shown in Table 4..6-3, below, at page 408. As can be seen from that Table, the total net loss in parking spaces under the Port's jurisdiction would range from 339 to 371, with 339 spaces being lost under the Preferred Alternative.

- In Section 4.6.6, Potential Economic Effects of Parking Displacement, the following text changes have been made:

  Addition of a new first paragraph under the section heading, which reads:

  As indicated above in Section 3.3.3, the Port of San Francisco has management and budgetary responsibilities distinct from the City of San Francisco. Hence, the loss of Port property due to the project has economic effects on the Port.

  Addition of a new third paragraph to that section (page 406a), which reads:

  The total existing supply of parking spaces in the Port jurisdiction area from Folsom to Broadway is 558 spaces (423 off-street; 135 on-street). The net change in this supply, by Alternative, is shown in Table 4..6-3, below, at page 408. As can be seen from that Table, the total net loss in parking spaces under the Port's jurisdiction would range from 339 to 371, with 339 spaces being lost under the Preferred Alternative.

- To reflect that there are three types of business displacement that would occur under the build alternatives, the following text has been inserted into the first paragraph of page 402 following the section heading 4.6.3, Business Displacement:

> "...; and (3) displacement of off-street parking in lots owned by Caltrans and leased to private operators."

- The discussion on environmental justice, as required by Executive Order 12898 of February 11, 1994, has been expanded by adding the following text to page 402:

> *In order to further ensure that there would be no disproportionately high adverse effects from the proposed project on the Chinatown area, City officials have held approximately 10 small group working sessions and three publicly noticed meetings with the Chinatown community between October 1995 and March 1996. A separate transportation study of the Chinatown area was conducted, and a variety of transportation programs and measures are proposed for the area, some as a part of this project, and some which would be implemented independently. See Section 4.5.6, pp. 386 for a complete discussion of the efforts of the proposed project on the Chinatown area, and the measures taken and proposed by the City to ensure that no disproportionately high adverse effects would be felt in that area.*

- A summary of the Uniform Act has been added to the EIS/EIR as Appendix F, and a reference to Appendix F has been added at the end of the third full paragraph on page 403.

The discussion on noise mitigation measures has been expanded by adding the following new text to pages 427 and 428A:

> *To reduce the potential for future roadway noise effects upon the Golden Gateway Tennis and Swim Club (GGTSC) facilities, a solid concrete block wall would be constructed along Washington Street (from Drumm to The Embarcadero), and along The Embarcadero, from Washington to the northern end of the GGTSC facilities (see Figure 4.7-2, Noise Barrier "A"). The wall would be approximately 3.0-3.6 meters (10-12 feet) tall, and would afford about 9 to 11 dBA of noise reduction to the GGTSC. Such a reduction would result in future noise levels of about 56 to 59 dBA at the GGTSC. The cost of such a wall is estimated to be approximately $216,000. A solid concrete block wall approximately 1.5-1.8 meters (5-6 feet) would afford about 5 dBA sound reduction, at a cost of about $144,000.*

To reduce the potential future roadway noise at Assessor's Block 202, an earthen berm or a sound wall of approximately 1.5-1.8 meters (5-6 feet) would be constructed along Washington Street (from Drumm to The Embarcadero), and along The Embarcadero, from Washington to the Boundary of Block 202 and Justin Herman Plaza. The Berm or wall would achieve about 5 dBA of sound reduction and would be constructed at 1.5-1.8 meters (5-6) feet in order to balance the desire for noise reduction with other project purposes, such as enhancing visual and pedestrian access to and from public parks and the waterfront. The cost of constructing such a berm or wall is estimated to be approximately $70,000.

After considering these potential noise mitigation measures, the City has rejected them for the following reasons:

Re: GGTSC

- *Proposed project is to consider alternatives to replace old Embarcadero Freeway*
- *Noise levels at this location were 72 dBA pre-quake; would be at 71 dBA with Preferred Alternative, i.e., lower than original levels*
- *Change from existing (68 dBA) to proposed levels (71 dBA) would be barely perceptible*
- *A 10 foot sound wall would afford about 9 dBA sound reduction, at a cost of about $216,000*
- *A 5 foot sound wall would afford about 5 dBA sound reduction, at a cost of about $142,000*
- *Sound wall would narrow sidewalk width, eliminating street trees*
- *Sound wall would have adverse aesthetic impacts; attract graffiti; only sound wall along Embarcadero*
- *Sound wall would be contrary to key objective of open visual connection to and from waterfront*
- *Sound protection would be for benefit of a relatively small number of private recreational users*
- *Greatest benefits to the greatest number of recreational users of area would be from no sound wall*
- *Cost of the sound wall would greatly outweigh benefits*

Re: Assessor's Block 202

- *Pre-quake noise levels at this location were 75 dBA; proposed project would change levels from existing (73 dBA) to 75 dBA); i.e., no higher than before*
- *Change from existing to future noise levels would be barely perceptible*
- *To be effective, noise wall/berm would have to be continuous, across entire site*

  - *A 5-6 foot berm across entire site would be visually obtrusive and constrain pedestrian access to open space from Embarcadero*
  - *Cost of such a berm estimated to be about $70,000*
  - *City is presently considering design options for site, and will consider possibility of some elevated areas, in coordination with Recreation and Parks Department*
  - *City want to retain flexibility to maximize beneficial use of park site*
  - *Project sponsor agrees to work together with Recreation and Park Department to develop appropriate landscape treatment for Block 202, taking into account noise, as well as visual and urban design considerations*
  - *Mandatory, continuous berm across entire site not in the best public interest*

- The following paragraph, clarifying the scope of the project with respect to utilities in the project vicinity is added after the mitigation measure at the top of page 469.

  Existing San Francisco Water Department facilities, including mains, valves, value boxes, hydrants, etc. identified from available drawings and preconstruction surveys, would be protected during construction, including temporary support during construction, and relocation or adjustment if necessary. Costs associated with work required to be done to protect existing Water Department facilities would be included in the total project cost of whichever alternative is selected.

- The following changes have been made with respect to construction effects of hazardous materials and mitigations:

  All Alternatives, including the No Build, could expose workers to hazardous materials during maintenance of subsurface utilities throughout the life of the roadway. Workers involved in excavation and repair of utilities under or adjacent to any roadway alternatives, could come into contact with contaminated fill which could adversely affect their health.

  To mitigate the potential effect of exposing utilities maintenance and repair workers to hazardous materials during the operation of the Mid-Embarcadero Roadway, the City would require notification to entities who would be performing utilities relocation work in connection with the Mid-Embarcadero portion of the project. The notification would include information on the types of contaminants likely to be encountered during relocation work.

- An introductory paragraph has been added to the archaeological resource mitigation measures section on page 506, as follows:

Much of the area that will be disturbed by project construction is under pavement and in use as roadways and sidewalks in an area of high-volume pedestrian and vehicular traffic. As it is not prudent to disrupt businesses and public uses of these areas by conducting archaeological excavations the one to two times normally required for eligibility and data recovery in addition to the disruption caused by project construction, a treatment plan has been developed based on (1) archival research which identifies the potential eligible sites and construction areas that may intrude upon intact subsurface deposits, (2) an excavation plan, (3) the data characteristics necessary to support eligibility, and (4) a data recovery plan if the data found at a specific site meets the eligibility criteria. The treatment plan approach allows eligibility assessment and data recovery decisions to be made in the field in a compressed time frame that is coordinated to closely precede construction at the site area(s) and, thereby, minimize business, community, *and traffic disruption. The project evaluation of effects and consultation with the SHPO utilized the treatment plan approach..*

- A memorandum of Agreement (MOA) pursuant to Section 106 requirement is included in a new Appendix (Appendix E) to the EIS/EIR.
- The Comments and Coordination section of the EIS/EIR (pages 523-572) has been expanded to provide new information on the two public hearings held on the Draft EIS/EIR (September 27 and 28, 1995), and the supplemental study for the Chinatown/North Beach area, which was conducted with extensive community participation. A comment letter from the Chinatown representatives regarding this effort has been added to this section (pages 531-534). Also included is a second letter from the U.S. Fish and Wildlife Service in response to a request for an updated list of listed and proposed endangered and threatened species that may occur within the area of the proposed project and a Caltrans letter documenting contacts with USFWS regarding project impact on endangered species (pages 534A-534H).
- Staff-initiated text changes made to the Section 4(f) Evaluation since publication of the Draft EIS/EIR are provided in the following brief summary:
  - Identify, describe the use of, and present measures to minimize harm for 4(f) properties directly affected by the proposed project alternatives (i.e. Justin Herman Plaza);
  - Describe other Park, Recreational Facilities, and Historic Properties evaluated for proximity impacts; and,
  - Describe Non 4(f) resources in the project area.

Other changes made to the 4(f) Evaluation are described below for each section of the report.

Introduction

Additional language has been added to the introduction regarding the federal regulations pertaining to the protection of Section 4(f) properties. In addition, information has been added to the introduction to more precisely describe the impact of each proposed alternative and the Preferred Alternative on Justin Herman Plaza.

Proposed Action/Definition of Alternatives

Information has been added to this section of the report to describe the DPT Variant/Preferred Alternative which was adopted by the Board of Supervisors of the City and County of San Francisco on January 29, 1996. The Preferred Alternative is a compromise between Alternative 4 and the 4th Street option of Alternative 5.

Description of Section 4(f) Property(ies)

nformation has been added to this section to describe in more detail the landscaped buffer along the eastern edge of Justin Herman Plaza between the soundwall and the Embarcadero Roadway. This area is commonly referred to as the "ragged edge" of Justin Herman Plaza.

Impacts on the Section 4(f) Property(ies)

Additional information has been added to provide more precise information regarding the use of Justin Herman Plaza, specifically the "ragged edge" area. Alternatives 2, 3 and 4 would use about 200 square meters (2,140 square feet) of the ragged edge area. Alternatives 5 would use 2,204 square meters (21,780 square feet) of Justin Herman Plaza. The Preferred Alternative would use 209 square meters (2,240 square feet). In addition, the Preferred Alternative would create 950 square meters (10,190 square feet) of new open space directly south of the ragged edge area. Overall the Preferred Alternative would result in a net increase in open space of about 921 square meters (9,860 square feet). The Preferred Alternative would also create new open space in front of the Ferry Building for Herb Caen Way (about 2,910 square meters [31,340 square feet]), and between the northbound and southbound lanes of the Embarcadero Roadway (about 3,510 square meters [37,830 square feet]) commonly referred to as the "Central Open Space". Information regarding the specific design of the Preferred Alternative at Justin Herman Plaza, *including design options for landscape treaments and sidewalk locations,* has also been added to this section.

Measures to Minimize Harm

Additional information has been added to this section to describe why there are no feasible and prudent alternatives to the use of Justin Herman Plaza. The reasons include:

- The desire of the City to create beneficial public open space in front of the Ferry Building; and,
- The Preferred Alternative is part of an overall design concept for the roadway and public open space in the project area.

Additional information has also been added relating to the plan to minimize harm to Justin Herman Plaza, including:

- The Preferred Alternative would provide a wider walkway in front of the Ferry Building (Herb Caen Way);
- Minimal effect would occur on the recreational use of Justin Herman Plaza; and,
- The transition between Justin Herman Plaza and the roadway would be designed to minimize the impact of the new roadway.

Other Park, Recreation Facilities, and Historic Properties Evaluated for Proximity Impacts

Information has been added to this section to clarify a number of different issues, including:

- The name of the Embarcadero Promenade has been changed to Herb Caen Way;
- A description of potential proximity impacts to each resource (no proximity impacts would occur as a result of the project); and,
- Additional information regarding compensation to the Port of San Francisco for lost parking such as construction of an underground garage on the southern half of Block 202 (not a section 4(f) resource).

Non 4(f) Resources

Additional information has been added to this section to clarify that the southern half of Block 202 and all of Block 203 are not 4(f) resources. The reason for this determination is that each of these blocks previously contained the Clay and Washington Street ramps to the Embarcadero Freeway. Therefore, the current landscaped areas of these blocks are considered temporary in nature.

Coordination

This section has been updated to include references to letters from the Port of San Francisco and the San Francisco Recreation and Park Department supporting the Preferred Alternative. In addition, clarification has been added that the Planning Department is not aware of any HUD properties that would be affected by the project.

- Other staff-initiated text changes: a number of other text changes have been made throughout the EIS/EIR to improve the readability of the material being presented. These changes are not specifically called out here in this Volume because they do not add new information; but they are identified in the EIS/EIR with italics.

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